UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
ENVIRONMENTAL SERVICES DIVISION
REGION 7
25 FUNSTON ROAD
KANSAS CITY, KANSAS 66115

AUG 7 1992

MEMORANDUM

SUBJECT: Transmittal of Inspection Report - RCRA

FROM: John W. Bosky
Chief, RCRA Monitoring Section, EMCM/ENSV

TO: Thomas F. Hogan
Chief, IRMS/PSBR/WSTM

This memorandum transmits the following compliance monitoring inspection report performed by the RCRA Monitoring Section, Environmental Monitoring and Compliance Branch, Environmental Services Division. The inspection was a Level I MMI. The primary media was RCRA and the secondary SPCC.

Facility	EPA ID Number	Activity No	Potential Areas of Non-Compliance
Hydrocarbon Recyclers, Inc. Wichita, KS	KSD007246846	AKF88	- Leaking Containers - Dented Containers - Personnel Training - LDR Storage >1yr. - Contingency Plan

Attachments

RECEIVED
AUG 10 1992
IRMS SECTION

RCRA INSPECTION REPORT RECEIPT AND FOLLOW-UP REQUEST

Facility Name: Hydrocarbon Recyclers, Inc.

Facility Location: Wichita KS

EPA ID Number: KSD007246846

Date of Inspection: 7/28/92

Inspector: Kris Goschen

Activity Number: ~~AR88~~ Inspection Type: A-61

Date Report Transmitted: / /

*Date Report Received: / /

*Additional Information Requested/Needed Not Included In Report:

#Photographs Taken: 0 #Photographs in Report:
*Additional Copies Needed (Specify Which)

*Additional Information Needed By: / /

Field Notes Taped [Yes/~~No~~]
*Disposition: Retain, Discard, Transcribe.

#Samples Taken: #Samples Analyzed:
*Disposition: Retain, Discard, Analyze more (specify which)

*Report Reviewed By:

*Date Review Completed: / /

*Items to be completed by RCRA Branch, WSTM and returned to Chief, Field Investigations Section, EMCM/ENSV

REPORT OF JOINT RCRA OVERVIEW INSPECTION

AT

HYDROCARBON RECYCLERS, INC.

WICHITA, KANSAS

EPA I.D. NUMBER: KSD007246846

JULY 28, 1992

BY

U.S. ENVIRONMENTAL PROTECTION AGENCY
Region VII
Environmental Services Division

INTRODUCTION

At the request of the Waste Management Division (WSTM), a RCRA Joint Overview Inspection (JOI) was performed at Hydrocarbon Recyclers, Inc. on July 28, 1992. This inspection was performed with the Kansas Department of Health and Environment (KDHE) as a means of evaluating the effectiveness, reliability, and completeness of the state's procedures in the administration and enforcement of their hazardous waste management program established pursuant to Section 3006 of the Resource Conservation and Recovery Act (RCRA), as amended. A Level I Multi-Media Screening Inspection, secondary media SPCC, was completed while at the facility (please refer to Multi-Media report file for inspection results). This narrative report and attachments present the results of the inspection.

PARTICIPANTS

Hydrocarbon Recyclers, Inc. (HRI):
Stephen M. Keiter, Facility Manager
Ronald K. Robertson, Facility Safety and Compliance Officer
Site Address: 2549 N. New York
Wichita, KS 67219
(316) 268-9496

Kansas Department of Health and Environment (KDHE):
Teresa Hansen, Environmental Technician
Siew P. Kour, Environmental Engineer

U.S. Environmental Protection Agency (EPA):
Kristan C. Goschen, Environmental Scientist

FACILITY DESCRIPTION

HRI is a hazardous waste management facility which receives

hazardous waste from a variety of off-site facilities. HRI engages in the on-site treatment and storage of this waste and in the shipment of this waste to its ultimate disposal site. The following major on-site waste management activities take place at HRI: 50% of all incoming waste is blended into hazardous waste fuel for cement kilns (Systec, Continental, and Pat Chemical, etc.), 30% of all incoming waste is repackaged for incineration (Rollins, Ensco, Ross, etc.), the remaining 20% of the incoming waste consists of wastewaters which are either deep well injected (Gibraltar, etc.) or used as cement kiln make-up water. Additional information about the facilities waste generation and management activities is contained in the facility's December 16, 1991 Part A and Part B application (EPA files), and in the Sept 10, 1991 KDHE inspection report (Attachment 1).

HRI currently employees 37 people in their waste management activities and they operate two 12 hour shifts per day, five days per week.

INSPECTION FINDINGS AND OBSERVATIONS

During the inspection the State inspector noted the following observations and apparent regulatory violations:

1. HRI is regulated as an EPA generator, eg. >1000kg/mo, under Kansas regulation K.A.R 28-31-8. They also have interim status for the treatment and storage of hazardous waste and are subject to K.A.R. 28-31-8. The facility is also subject to the requirements for a hazardous waste fuel marketer, K.A.R. 28-31-8b. The inspection was conducted based on the above regulations.

a. It should be noted that I briefly reviewed the facilities compliance with the 40 CFR 265 Subpart BB requirements while at the facility. Kansas is currently not authorized for this portion of the RCRA regulations. No significant problems were noted during my review.

2. Ms. Hansen reviewed the waste streams identified during the previous inspection and noted the following changes: The tetrachloroethylene contaminated carbon scrubber filters used by the facility were now being incinerated by Rollins, Dear Park, TX, instead of being sent to Systec, Fredonia, KS; The facility's characteristic corrosive wastes are either land filled at USPCI's Lone Mountain, OK, facility or, if they carry listed waste codes, incinerated by Ensco or Rollins; The waste oil received by the facility in no longer sent to Systec as waste oil but is now blended into the hazardous waste fuel. No other significant changes were noted in the facility's waste generation or management activities.

3. Ms. Hansen reviewed the following facility records for the specific items noted: The personnel training records to verify

that facility personnel were trained annually or within six months of employment; The contingency plan to determine if the emergency coordinators were current; The inspection logs; The manifests, both incoming and outgoing and; The Biennial reports.

In addition to reviewing the records or portions of records identified above, Ms. Hansen verified that the facility maintained the closure/post-closure plan, waste analysis plan, financial assurance records, and liability insurance records required by TSDF's on-site. Ms. Hansen did not review of the contents of these records during the inspection. Ms. Hansen had conferred with Ms. Kour (the State permit writer) prior to the inspection and a determination was made not to conduct a thorough review the records on-site, except for the items noted above, since Ms. Kour was conducting an on-going review of the facility's Part B.

Observations noted by Ms. Hansen during the records review include:

a. Mr. Robertson, Facility Safety and Compliance Officer, provides much of the personnel training at the HRI, however there were no records to show that Mr. Robertson had received his annual personnel training per 40 CFR 265.16.

b. The contingency plan failed to be up-dated with the name of the current emergency coordinators. Mr. Joe Dowdey replaced Mr. James Hamilton as one of the emergency coordinators when Mr. Hamilton ceased being employed at HRI. The contingency plan was not up-dated to reflect this change per 40 CFR 265.52.

c. No apparent problems were noted with the inspection records.

d. A review of the manifests and LDR notices revealed that the LDR notice for one off-site generated manifest, a shipment of waste from Byron Originals Inc. to Van Waters and Rogers on manifest #92002, dated 5/14/92, and subsequently shipped from Van Waters and Rogers to HRI on manifest #92037, dated 5/26/92, failed to note the second manifest number (#92037) on the LDR notice. Ms. Hansen told Mr. Keiter that she the LDR notices need to have the correct manifest number on them and that she would review the procedures for managing brokered waste shipments and comment on the compliance status of this LDR notice in her report.

e. No apparent problems were noted with the Biennial Reports.

4. Ms. Hansen did a visual inspection of all areas of the facility where hazardous wastes were generated or managed. She noted the following observations:

a. There were three drums and three small containers of cleaning products used by HRI in Building D. HRI had labeled this material with the words "NON-HAZARDOUS WASTE." Mr. Keiter said that HRI routinely labels materials which are products as non-hazardous waste. Ms. Hansen suggested that it would be a better management practice if these containers labels did not include the word "waste" in the label name.

b. Two 5-gallon containers of metallic mercury waste, with waste code U-151, were stored over one year. Mr. Keiter said that there were no facilities in the U.S. which could dispose of the mercury waste if it carried the U-151 waste code. He said that the waste code is used by Sheppard Air Force Base, Wichita Falls, TX. Mr. Keiter said that Sheppard AFB managed all of their mercury waste as U-151 even though it was a spent material and should be classified as D009 waste. Mr. Keiter said that he had discussed this matter with them and that they refused to change the wastes classification. Ms. Hansen reviewed file information which showed that HRI had contacted the major mercury recyclers/disposers in an effort to properly manage this shipment of waste. Ms. Hansen noted that it appeared that HRI had no alternative but to store this waste until disposal or treatment is available for the U-151 waste code.

c. Three drums of hazardous waste were found leaking and three drums were found severely dented in Building C. Building C is an interim status container storage area and the containers need to be stored in compliance with 40 CFR 265 Subpart I. Another severely dented drum of waste was observed in Building B.

d. No apparent problems were noted in the waste processing area or with the hazardous waste storage tanks.

e. No apparent problems were noted with the emergency and spill control equipment.

5. A NOV was not issued during the inspection per KDHE procedures.

DISCUSSION OF INSPECTION

The following discussion and comments are provided as the basis for evaluating the performance of the state inspector during the inspection.

Preparation for Inspection

1. Ms. Hansen had thoroughly reviewed HRI's file material prior to the inspection.

2. Ms. Hansen had the majority of the necessary equipment and supplies, e.g., checklists, copies of regulations, safety

equipment, note pads, camera, etc., to adequately conduct the inspection.

Comments:

Ms. Hansen had arranged the necessary equipment to conduct the inspection prior to leaving her office. However, upon reaching the site and taking a few photographs, she realized that she did not have enough film left in her camera to adequately document her additional observations. I explained to her the need to carry extra film, camera batteries, etc. during the inspection, and the fact that adequate photo documentation is an essential part of the inspection process. I provided Ms. Hansen with the necessary film and she documented all observations.

Entry Procedures

1. The inspection was conducted during normal business hours and on an unannounced basis.

2. Ms. Hansen took the lead role in conducting this inspection.

3. Upon arrival at the facility Ms. Hansen contacted Mr. Keiter and Mr. Robertson who acted as the official facility representatives during the course of the inspection. Ms. Hansen, and I presented our credentials and Ms. Hansen explained the purpose, and scope of the inspection. She explained that the inspection would consist of a discussion of facility operations, waste generation and waste management practices, a review of the required hazardous waste management plans, programs and records, and a visual inspection of the hazardous waste management areas. Ms. Hansen also informed the facility of their right to make a confidential business information claim if they so desired.

Comments:

Ms. Hansen thoroughly explained the preliminary information to the facility representatives, however she failed to explain the authority, Section 3007 of RCRA, under which the inspection was conducted. I explained to Ms. Hansen that the initial briefing is an important part of the inspection and each of the above noted items needs to be fully explained the facility representatives.

Facility Records Check

1. Ms. Hansen verified that all waste streams were properly identified and determined the compliance status of the required records or portions of records and documents which she reviewed. Ms. Hansen first reviewed the generator status of the facility and noted all changes since the last inspection. An

inspection checklist was used during this portion of the inspection. All apparent violations were documented through photocopies and notes.

Comments:

I suggested to Ms. Hansen that she briefly review all facility's records, including those records in which Ms. Kour was reviewing for HRI's permit, for compliance with the interim status requirements since the facility does not yet have their permit. I noted that one often finds a facility is not operating as described in their Part B submittal and that the compliance status of the facility with the interim status requirements is essential until the permit is actually issued.

Site Inspection

1. Ms. Hansen inspected all areas of the facility where hazardous wastes were generated or managed. She documented all potential or apparent violations through photographs and notes.

Comments:

Ms. Hansen did a good job inspecting the container management areas and made good use of her pre-inspection notes. I suggested that during the next inspection of HRI, she spend a little more time inspecting the tank storage areas. I also suggested that she could enhance her inspection procedures by being more independent while conducting the visual portion of the inspection. Ms. Hansen did a good job varifing that the facility's emergency eye wash stations actually functioned as designed by testing several of them.

Outbriefing

1. At the conclusion of the inspection Ms. Hansen summarized and reviewed her findings and recommendations.

Comment:

The individual significance of the apparent violation related to HRI's waste management activities were fully explained during the outbriefing. Ms. Hansen summarized each of her observations and answered all of the questions that the facility representatives had.

Summary Comments

1. Ms. Hansen conducted the inspection in a professional manner. She freely questioned facility personnel about the waste management practices and the observed regulatory problems. During the questioning process Ms. Hansen avoided using leading

questions.

2. Ms. Hansen properly evaluated the facility's waste management practices and compliance status.

3. After the facility outbriefing Ms. Hansen and I discussed the overview process and my evaluation of her inspection performance. The following additional observations are noted:

a. Ms. Hansen has conducted RCRA compliance inspection since May of 1989. She has conducted several small quantity generator inspection, 8-10 large quantity generator inspections, has accompanied other inspectors on three or four TSDF inspections, and has conducted one TSDF inspection on her own prior to this inspection.

b. Given her level of experience and the complexity of the facility, Ms. Hansen adequately conducted this inspection. Ms. Hansen showed good judgement in contacting the permit writer, Ms. Kour, to accompany her on this inspection. Ms. Hansen and Ms. Kour worked as an efficient team during this inspection.

4. A Joint RCRA Overview Inspection Checklist was completed during the inspection to document the activities of the KDHE inspector (Attachment 2). Ms. Hansen's field notes are contained in Attachment 3.

5. A Pollution Prevention Worksheet was completed and is contained in Attachment 4.

Kristan C. Goschen
Environmental Scientist
Date: 08/04/92
Activity Number: AKF88

John W. Bosky
Chief, RCRA Monitoring Section
Date: 8/6/92

Attachments:

1. 9/10/92 KDHE Inspection Report (26 pages)
2. Joint Overview Checklist (4 pages)
3. KDHE Field Notes (8 pages)
4. Pollution Prevention Checklist (1 page)

Attachment 1

Kansas Department of Health and Environment
Bureau of Air and Waste Management
Forbes Field, Topeka, Kansas 66620

Hazardous Waste Generator/ Transporter Compliance Inspection Report

General

Time 8:30 AM Date 9-10-91

Facility Name Hydrocarbon Recyclers, Inc. EPA ID No. KSD007246846

Street 2549 N. New York City Wichita, KS Zip 67219

Mailing Address (if different than above)

County Sedgwick Phone (316) 268-9490

Contact(s) Steve Keiter, Facility Manager

Ron Robertson,

Inspector(s) Ron Smith, Teresa Hansen, Siew Kour

Type of Business Commercial T/S/D - Hazardous Waste Fuel Marketer.

Has the company declared any information/processes as trade secrets (K.S.A. 65-3447)? If yes, explain. Yes (No)

Industrial Wastes Generated *

(List hazardous wastes first) *Also See Attached List of Waste Codes.

~~Waste~~	Chlorinated Solvents	Tetrachloroethylene contaminated wastes (carbon, filters) (Incinerated by Rollins Ross Gratton)
If waste is hazardous, give H.W. ID Number:	F001/F002	F002
Amount generated per month:		
Amount presently in storage:		0
Accumulation time:		
Present disposal method:	HRI, Tulsa, OK and HRI, San Antonio, Tx.	Systech, Fredonia, Ks.

Waste:	Flammable Wastewater	Solvent and paint solvent mixture (kiln fuel)
If waste is hazardous, give H.W. ID Number:	D001/D007/D008	D001/F003/F005
Amount generated per month:		
Amount presently in storage:		
Accumulation time:		
Present disposal method:	Gilbalty Incineration - ~~Rollins~~ Deep Well Injection	~~Systech, Fredonia, Ks.~~ or 2

Waste:	Oxidizers	Non-blendable Wastes
If waste is hazardous, give H.W. ID Number:	D001	D004 - D011
Amount generated per month:		
Amount presently in storage:		
Accumulation time:		aqueous cool 5 Landfill
Present disposal method:	Incineration - Rollins or Ensco.	USPCI, Lone Mountain, OK. Incineration - Rollins or Ensco. If low solvents

Waste:	Blendable Wastes for Kiln Fuel	Corrosives
If waste is hazardous, give H.W. ID Number:	D001/F001/F002/F003/F005 Approved U wastes, D004 - D011 D00 18-43	D002/D007
Amount generated per month:		
Amount presently in storage:		- If listed - Inc Ensco/Rollins
Accumulation time:		clarify - NS
Present disposal method:	Systech, Fredonia, Ks. and Heartland Cement, Independence	USPCI, Lone Mountain, OK.

Waste:	Non-hazardous waste-water	Used Oil
If waste is hazardous, give H.W. ID Number:	none	none
Amount generated per month:		
Amount presently in storage:	Haul to Gilbarco for water Treatment	
Accumulation time:		Blended as Boiler Fuel
Present disposal method:	USPCI, Lone Mountain, OK ~~or incineration~~ Systec Non-HW - recap	Systech, Fredonia, Ks.

I. Has the facility evaluated all potentially hazardous waste(s) to determine if it is hazardous? (K.A.R. 28-31-4(b)) (Yes) No
   A. If waste(s) was tested, was the analysis conducted by a laboratory certified by KDHE? (K.A.R. 28-31-4(f)) (Yes) No NA
   B. If waste(s) was tested, are the results kept for three years? (K.A.R. 28-31-4(f)(1)(c))? (Yes) No NA

II. If hazardous waste(s) is disposed of via the sanitary sewer to a Publicly Owned Treatment Works (POTW) has written permission been obtained from the operator of the POTW? (K.A.R. 28-31-3/40 CFR 261.4) Yes No (NA)

Non-hazardous wastes only.

III. If industrial waste(s) is disposed of at a permitted sanitary landfill, has a disposal authorization been obtained? (K.A.R. 28-29-23) Yes No (NA)
   A. If yes, list the authorization number(s):

IV. Facility size classification:

- ☐ Not a Gen.
- ☒ T/S/D Facility
- ☐ Small Qt. Gen.
- ☐ Transporter
- ☐ Ks. Gen.
- ☒ H.W. Burner/Marketer
- ☒ EPA Gen.
- ☐ Used oil Burner/Marketer

Hazardous Waste Determination Requirements: ☒ Adequate ☐ Inadequate

Notification Requirements

V. Has generator Notified KDHE and obtained an EPA Identification Number? (K.A.R. 28-31-4(c)) (Yes) No NA

VI. Is current Notification accurate? (K.A.R. 28-31-4(e)) (Yes) No NA
   A. Is this facility marketing (selling) hazardous waste as a fuel? (Yes) No NA
   B. Is this facility marketing (selling) used oil as a fuel? Yes (No) NA
   (If yes, to either question A or B, complete Used Oil Fuel Marketers/Blenders Checklist.)
   C. Is this facility burning hazardous waste as a fuel? Yes (No) NA
   D. Is this facility burning used oil as a fuel? Yes (No) NA

Notification Requirements: ☒ Adequate ☐ Inadequate ☐ NA

(If small quantity generator, stop here.)

Manifests

VII.	Is a contractual agreement used in place of manifesting? (K.A.R. 28-31-4(c))	Yes	(No)	
	A. If yes, does the contractural agreement include the type of waste and frequency of shipments?	Yes	No	(NA)
	B. If yes, is the vehicle used to transport the waste owned and operated by the reclaimer of the waste?	Yes	No	(NA)
	C. If yes, is a copy of the agreement kept for a period of three years after termination of agreement?	Yes	No	(NA)
VIII.	Is a current manifest showing revision date and burden disclosure statement used? (K.A.R. 28-31-4(d)/40 CFR 262.20)	(Yes)	No	NA
	A. If yes, does manifest(s) include:			
	1. Generator EPA Identification Number (twelve digit) and manifest document number (five digit)?	(Yes)	No	NA
	2. Number of pages?	(Yes)	No	
	3. Generators name and mailing address?	(Yes)	No	
	4. Generators phone number?	(Yes)	No	
	5. Transporter 1 Name?	(Yes)	No	
	6. Transporter 1 EPA Identification Number?	(Yes)	No	
	7. Transporter 2 Name?	(Yes)	No	NA
	8. Transporter 2 EPA Identification Number?	(Yes)	No	NA
	9. Name and site address of designated facility?	(Yes)	No	
	10. Designated facility's EPA Identification Number?	(Yes)	No	
	11. Waste Description (DOT shipping name, hazard class, and Identification Number)?	(Yes)	No	
	12. Number and type of containers?	(Yes)	No	
	13. Total Quantity?	(Yes)	No	
	14. Unit (weight or volume)?	(Yes)	No	
	15. Special handling instructions?	(Yes)	No	NA
	16. Generators certification including waste minimization statement, generators signature and date?	(Yes)	No	
	17. Name, signature and date of transporter 1?	(Yes)	No	
	18. Name, signature and date of transporter 2?	(Yes)	No	NA
	B. Does generator retain a copy of manifest(s) signed by both generator and transporter? (K.A.R. 28-31-4(d)/40 CFR 262.23)	(Yes)	No	
	C. Does generator retain copy of manifest(s) signed and dated by T/S/D/ facility owner/operator for three years? (K.A.R. 28-31-4(f)(1)(A))	(Yes)	No	
	D. Has generator ever failed to receive a signed copy of a manifest within 45 days of initiating a shipment?	Yes	(No)	
	1. If Yes, was exception report(s) filed? (K.A.R. 28-31-4(f)(4))	Yes	No	(NA)
	2. If Yes, was copy retained for 3 years? (K.A.R. 28-31-4(f)(1)(B))	Yes	No	(NA)

Manifesting Requirements: ☒ Adequate ☐ Inadequate ☐ NA

Land Disposal Restrictions Requirements

IX. Does facility generate any wastes subject to the land disposal restrictions requirements of 40 CFR 268, Subparts B and C? List these wastes: (Yes) No

A. All Wastes.
B. _____
C. _____
D. _____
E. _____
F. _____

X. Is the waste(s) covered by a National Variance(s), Extension, or Petition? (40 CFR 268 5&6) Yes (No)

A. If Yes, describe the variance, extension, or petition which applies:

_____

_____

XI. Is the waste covered by an exemption? (40CFR 268.1(c)(3)) Yes (No)

A. If yes, does the generator provide a notice with the waste to the T/S/D facility stating that the waste is exempt from the land disposal restrictions? (40CFR 268.7(a)(3)) Yes No (NA)

XII. Does generator ship waste(s) covered by the Land Disposal Restrictions off-site for treatment or disposal? (Yes) No

A. If Yes, does the generator provide a Notification to the T/S/D facility that includes: EPA hazardous waste number(s), applicable treatment standards, manifest number(s), and waste analysis data, if available? (40CFR 268.7) (Yes) No

B. If yes, is a copy of this notification kept for 5 years? (Yes) No

XIII. Does generator treat restricted waste(s) on-site so that they are below the land disposal restrictions standards? (If Yes, fill out land disposal restrictions checklist.) Yes (No)

Land Disposal Restrictions Requirements:	☒ Adequate	☐ Inadequate	☐ NA

Pre-Transport Requirements

XIV. Does generator package waste in accordance with DOT requirements? (K.A.R. 28-31-4(e)(1)) (Yes) No NA

XV. Does generator label (flammable liquid, poison, etc.) each package in accordance with DOT requirements of 49 CFR 172.101 or 172.102? (K.A.R. 28-31-4(e)(2)) (Yes) No NA

XVI. Does generator mark (consignee's or consignor's name and address, etc) on each package in accordance with DOT requirements of 40 CFR 172 Subpart D? (K.A.R. 28-31-4(e)(3)) (Yes) No NA

A. Does generator mark each container of 110 gallons or less as below? (K.A.R. 28-31-4(e)(3)) (Yes) No NA

Hazardous Waste-Federal Law Prohibits Improper Disposal.
If found, contact the nearest police or public safety authority or the U.S. EPA.

Generator's Name and Address

Manifest Document Number

XVII. Does generator have placards to offer to transporters in accordance with 49 CFR 172 Subpart F? (K.A.R. 28-31-4(e)(4)) (Yes) No NA

XVIII. Does generator only use a transporter who is properly registered with the department? (K.A.R. 28-31-4(g)) (Yes) No NA

Pre-Transport Requirements: ☒ Adequate ☐ Inadequate ☐ NA

Biennial Reports

XIX. Has generator submitted a biennial report(s) to KDHE? (K.A.R. 28-31-4(f)(2)) (Yes) No NA

A. If Yes, does generator retain copies for three years? (K.A.R. 28-31-4(f)(1)(B)) (Yes) No NA

Biennial Report Requirements: ☒ Adequate ☐ Inadequate

Special Conditions

XX. Has generator received or transported any hazardous waste to or from a foreign source? (40 CFR Subpart E) (Yes)* No

A. If Yes, has generator filed a Notice with the Secretary of Health and Environment? Yes (No) NA

B. Is waste manifested and signed by a foreign consignee? (Yes) No NA

C. If generator transports wastes out of the country, has confirmation of delivered shipment been received? Yes No (NA)

*See attached letter of explanation from facility.

Special Conditions Requirements: ☐ Adequate ☐ Inadequate ☐ NA

Storage Requirements

XXI. Does generator temporarily store waste before transport? (Yes) No

A. For 90 days or less? (Yes) No NA

B. For more than 90 days? (Yes) No NA

C. If waste is stored in containers:

1. Are containers marked with the words: "Hazardous Waste"? (K.A.R. 28-31-4(g)(3) or (h)(1)(D)) Yes (No) NA
2. Is the accumulation start date marked on each containers? (K.A.R. 28-31-4(g)(2) or (h)(1)(C)) Yes (No) NA
3. Are all containers holding hazardous waste closed during storage except when necessary to add or remove waste? (K.A.R. 28-31-4(g)(1) or (h)(1)(B)) (Yes) No NA
4. Does generator conduct weekly inspections of containers for signs of leakage and/or deterioration caused by corrosion or other factors? (K.A.R. 28-31-4(k)) (Yes) No NA

   a. If Yes, are these inspections documented in a log that includes date and time of inspection, full name of inspector, notations of observations, and date and nature of remedial actions? (K.A.R. 28-31-4(d)/40 CFR 265.15(d)) (Yes) No NA

5. Are containers holding ignitible or reactive waste(s) located at least 15 meters (50 feet) from the facility's property line? (EPA Generator and T/S/D Only) (K.A.R. 28-31-4(g)(1)) (Yes) No NA

6. If waste in containers is incompatible with other materials stored nearby, are the containers separated from the other materials by means of a dike, berm, wall, or other means? (K.A.R. 28-31-4(g)(1) or (h)(1)(B)) (Yes) No NA

7. Does generator have any satellite storage areas? (K.A.R. 28-31-4(j)) (Yes) No NA
If yes,

   a. Is the waste stored in a container at or near the point of generation and under the control of the operator of the process generating the waste? (Yes) No

   b. Is the container in good condition and closed except to add or remove waste? (Yes) No

   c. Is the container marked with the words: "Hazardous Waste"? (Yes) No

   d. Is the container marked with the accumulation start date at the time it becomes full? (Yes) No

   e. Is the full container moved to the storage area within 3 days after it became full? (Yes) No

(If waste(s) is placed in tanks, piles, or surface impoundments complete the appropriate inspection checklist.)

Storage Requirements: ☐ Adequate ☒ Inadequate ☐ NA

Kansas Generator's Emergency Preparedness

XXII. Has facility named one employee as emergency coordinator? (K.A.R. 28-31-4(h)(1)(E)) Yes No

   A. Is the emergency coordinator available to respond to an emergency by reaching the facility within a short period of time? Yes No

   B. Is the emergency coordinator or his/her designee prepared to respond to any emergencies (fires, spills, or releases) that arise? Yes No

   C. Is the emergency coodinator familiar with the reporting requirements of K.A.R. 28-31-4(h)(2)? Yes No

XXIII. Is the following information posted next to at least one telephone which is immediately asscesssible in an emergency: (K.A.R. 28-31-4(h)(1)(F))

   A. Name and telephone of emergency coordinator? Yes No

   B. Location of fire extinguishers, fire alarms, or spill control material, if available? Yes No

   C. Telephone number of fire department unless the facility has a direct alarm? Yes No NA

XXIV. Have employee's been trained so that they are familiar with proper waste handling and emergency procedures that are relevant to their responsiblities during normal facility operations? (K.A.R. 28-31-4(h)(1)(G)) Yes No

   A. Is this training documented in any way? Yes No

Kansas Generator's Emergency Preparedness Requirements: ☐ Adequate ☐ Inadequate ☐ NA

(If Kansas generator, stop here.)

Preparedness and Prevention

XXV. If appropriate, based upon the nature and quantity of wastes generated and stored at the facility, is the facility equipped with:

A. Internal communication or alarm system easily accessible in case of emergency? (K.A.R. 28-31-4(g)(4)/40 CFR 265.32(a)) Yes No NA

B. Telephone or hand-held two-way radio capable of summoning emergency response personnel? (K.A.R. 28-31-4(g)(4)/40 CFR 265.32(b)) Yes No NA

C. Portable fire extinguisher, fire control equipment, spill control equipment, and decontamination equipment? (K.A.R. 28-31-4(g)(4)/40 CFR 265.32(c)) Yes No NA

D. Is water of adequate volume provided for hose streams, foam producing equipment, sprinklers, etc.? (K.A.R. 28-31-4(g)(4)/40 CFR 265.32(d)) Yes No NA

E. Is this equipment (A-C above) tested and maintained to assure its proper operation? (K.A.R. 28-31-4(g)(4)/40 CFR 265.33) Yes No NA

XXVI. Does a check of the facility show sufficient aisle space to allow unobstructed movement of personnel and equipment? (K.A.R. 28-31-4(g)(4)/40 CFR 265.35) Yes No NA

XXVII. If appropriate for the type(s) of waste handled, has the owner/operator made the following arrangements:

A. Familiarized the local emergency authorities with the facility, wastes handled, entrances and exits? (K.A.R. 28-31-4(g)(4)/40 CFR 265.37(a)(1)) Yes No NA

B. Designated one authority where one or more police or fire departments might respond to an emergency? (K.A.R. 28-31-4(g)(4)/40 CFR 265.37(a)(2)) Yes No NA

C. Made agreements with local emergency response teams, emergency response contractors, and equipment suppliers? (K.A.R. 28-31-4(g)(4)/40 CFR 265.37(a)(3)) Yes No NA

D. Familiarized local hospitals with the properties of hazardous waste handled and types of injuries which could result from fires, explosions, or releases at the facility? (K.A.R. 28-31-4(g)(4)/40 CFR 265.37(a)(4)) Yes No NA

XXVIII. In cases where local authorities decline to enter into such arrangements, is the refusal entered in the operating record? (K.A.R. 28-31-4(g)(4)/40 CFR 265.37(a)(b)) Yes No NA

Preparedness and Prevention Requirements:	☐ Adequate	☐ Inadequate	☐ NA

Personnel Training

XXIX. Has the owner/operator established a hazardous waste management training program? (K.A.R. 28-31-4(g)(4)/40 CFR 265.16) Yes No

A. Is the program directed by a person trained in hazardous waste management? (40 CFR 265.16(a)(2)) Yes No

B. Are new personnel trained within six months after their employment? (40 CFR 265.16(b)) Yes No

C. Are new employees supervised until training is completed? (40 CFR 265.16(b)) Yes No

D. After initial training, are employees trained on an annual basis? (40 CFR 265.16(c)) Yes No

E. Does the facility maintain the following documents and records:

1. Job title and job description for each position related to hazardous waste management? (40 CFR 265.16(d)(1) & (2)) Yes No
2. Description of type and amount of training to be given each person? (40 CFR 265.16(d)(3)) Yes No
3. Records of training given to facility personnel? (40 CFR 265.16(d)(4)) Yes No

Personnel Training Requirements:	☐ Adequate	☐ Inadequate

Contingency Plan

XXX. Does the facility have a contingency plan? (K.A.R. 28-31-4(g)(4)/40 CFR 265 Subpart D) Yes No
If yes,

A. Does the plan list the names(s), home address, and phone numbers of designated emergency coordinator(s) in the order in which they should be contacted? (40 CFR 265.52(d)) Yes No

B. Is an emergency coordinator available at all times? (40 CFR 265.55) Yes No

C. Does the plan describe emergency actions facility personnel must take to respond to fires, explosions, or releases of hazardous waste? (40 CFR 265.52(a)) Yes No

D. Does the plan describe arrangements made with emergency response agencies? (40 CFR 265.52(c)) Yes No

E. Does the plan include a list of all emergency equipment at the facility, its location, a physical description of each item on the list, and a brief outline of its capabilities? (40 CFR 265.52(e)) Yes No

F. Does the plan include an evacuation plan for facility personnel that describes signals and evacuation routes? (40 CFR 265.52(f)) Yes No

G. Have copies of the plan been provided to outside emergency response agencies and hospitals? (40 CFR 265.53) Yes No

Contingency Plan Requirements:	☐ Adequate	☐ Inadequate

(If EPA generator, stop here.)

Transporter Requirements

XXXI. Does this facility transport hazardous waste? (Yes) No
If yes,

A. Are they registered as a hazardous waste transporter in the State of Kansas? (K.A.R. 28-31-6 (b)) (Yes) No

B. Does transporter comply with the manifest requirements of 40 CFR 263.20 except 263.20(h)? (Yes) No

C. Does transporter retain a copy of the manifest for three years? (40 CFR 263.22(a)) (Yes) No

D. Does this facility transport hazardous waste subject to the manifest exemption of K.A.R. 28-31-4(d)(7)? Yes (No)
If yes,

1. Does the transporter record the name, address, and EPA ID number of the generator, quantity of waste shipped, DOT shipping information, and the date the waste was accepted in a log or shipping paper? Yes No (NA)
2. Does the transporter carry this record when transporting the waste to the reclamation facility? Yes No (NA)
3. Does the transporter retain these records for a period of three years after the termination or expiration of the agreement? Yes No (NA)

Transporter Requirements:	☒ Adequate	☐ Inadequate	☐ NA

Additional information and conclusions:

MIKE HAYDEN
Governor
JACK D WALKER M D
Secretary

STATE OF KANSAS

Forbes Field
Topeka KS 66620-0001
(913) 862-9360

DEPARTMENT OF HEALTH AND ENVIRONMENT

RCRA Compliance Inspection Report

T/S/D Facilities Checklist

A. General

Date 9-10-91 Time 8:30 AM EPA ID No. KSD007246846

Facility Name Hydrocarbon Recyclers, Inc.

Street 2549 N. New York

City Wichita, Kansas Zip 67219

County Sedgwick Phone (316) 268-9490

Contact Steve Keiter, Facility Manager

Inspector Ron Smith, Teresa Hansen, Siew Kour

Other

B. Activity at Site

Treatment	Storage	Disposal
___ Chem/Phys/Bio Treatment	X Drums	___ Incineration
___ Filtration	___ Pile	___ Landfill
___ Incineration	___ Surface Impoundment	___ Land Treatment
___ Recycling/Recovery	X Tank, Above ground	___ Surface Impound
___ Reprocessing	___ Tank, Below ground	___ Other (
X Solvent Recovery	___ Other ( )	
___ Thermal Treatment		
___ Volume Reduction		
___ Waste Oil		
___ Other ( )		

Comments: _____

C. Waste Analysis Plan

265.13 1. Does facility maintain a copy of its waste analysis plan at the facility? (YES) NO

A. If yes, does the plan include:

1. Parameters for which each hazardous waste will be analyzed and rationale for the selection of these parameters. (YES) NO

2. Test methods which are used to test for these parameters. (YES) NO

3. Sampling method used to obtain sample. (YES) NO

4. Frequency with which the initial analysis will be reviewed or repeated to ensure the analysis is current. (YES) NO

5. For off-site facilities, the waste analyses that generators have agreed to supply. YES NO

6. For off-site facilities, the procedures which are used to inspect and analyze each movement of hazardous waste received to ensure that it matches the identity of the waste designated on the manifest. (YES) NO

Waste analysis plan requirements:

[X] Adequate [ ] Inadequate

D. Security

265.14 1. Does the facility provide either of the following:

a. A 24-hour surveillance system? (T.V. monitoring or guards). YES (NO)

b. An artificial or natural barrier (fence, fence and cliff combination) and a means to control entry (attendant, T.V. monitoring, locked entrance, controlled roadway access). (YES) NO

2. Does the facility provide warning signs at entrances. (YES) NO

3. Does the facility consider itself exempt from security requirements? YES (NO)

Security requirements:

[X] Adequate [ ] Inadequate [ ] Not Applicable

E. General Inspection Requirements

265.15 1. Does the owner/operator maintain a written schedule at the facility for inspecting:

a. Monitoring equipment (YES) NO

b. Safety and emergency equipment (YES) NO

c. Security devices (YES) NO

d. Operating and structural equipment (YES) NO

2. Does the inspection schedule identify the types of problems which are to be looked for during the inspections? (YES) NO

3. Does the owner/operator maintain an inspection log? (YES) NO

a. If yes, does the log contain the:

1. Date and time of inspection (YES) NO

2. Name of inspector (YES) NO

3. Notation of observations (YES) NO

4. Date and nature of repairs or remedial action YES (NO)

Inspection requirements:

[ ] Adequate [X] Inadequate

F. Personnel Training

265.16 1. Does the owner/operator maintain at the facility the following documents and records:

a. Job title and job description for each position related to hazardous waste management. (YES) NO

b. Description of type and amount of training to be given each person. (YES) NO

c. Records of training given to facility personnel. (YES) NO

Personnel training requirements:

[X] Adequate [ ] Inadequate

G. Requirements For Ignitable, Reactive, or Incompatible Wastes

265.17

1. Does the facility handle ignitable or reactive wastes? (YES) NO

   a. If yes, is the waste separated and confined from sources of ignition or reaction, sparks, spontaneous ignition, and radiant heat? (YES) NO

2. Are smoking and open flames confined to specially designated locations? (YES) NO

3. Are "No Smoking" signs posted in hazard areas? (YES) NO

4. Does a check of these areas show any leakage or corrosion of containers? (YES) NO

5. Does a check of these areas show evidence of heat generation from interaction of incompatible wastes? YES (NO)

Ignitable, reactive, or incompatible waste requirements:

[X] Adequate [ ] Inadequate [ ] Not Applicable

H. Preparedness and Prevention

265.31

1. Does an inspection of the facility show any evidence of fire, explosion, or contamination? YES (NO)

265.32

2. If applicable to the facility, is the facility equipped with:

   a. Internal communication or alarm system easily accessible in case of emergency? (YES) NO

   b. Telephone, hand-held two-way radio capable of summoning emergency response personnel? (YES) NO

	3.	Are portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment provided?	(YES) NO NA
	4.	Is water of adequate volume provided for hose streams, foam producing equipment, sprinklers, etc.?	(YES) NO NA
265.33	5.	Is this equipment (1-4 above) tested and maintained to assure its proper operation?	(YES) NO NA
265.35	6.	Does a check of the facility show sufficient aisle space to allow unobstructed movement of personnel and equipment?	YES (NO) NA
265.37	7.	If appropriate for the type(s) of waste handled has the owner/operator made arrangements with the local emergency authorities to familiarize them with the layout of facility, properties of wastes handled and associated hazards, places where facility personnel normally work, entrances to roads inside facility, and possible evacuation routes?	(YES) NO NA
	8.	In areas where more than one police and fire department might respond, is there one designated authority?	YES NO (NA)
	9.	If appropriate for the type(s) of waste handled does the owner/operator have agreements with State emergency response teams, emergency response contractors, and equipment suppliers?	YES NO (NA)
	10.	If appropriate for the type(s) of waste handled has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste(s) handled and types of injuries which could result from fires, explosions, or releases at the facility?	(YES) NO
	11.	In cases where state or local authorities decline to enter into such arrangements, is the refusal entered in the operating record?	YES NO (NA)

Preparedness and prevention requirements:

[ ] Adequate [X] Inadequate

I. Contingency Plan and Emergency Procedures

262.53	1.	Is a contingency plan maintained at the facility and have copies been provided to outside agencies which may be called upon to provide emergency services?	(YES) NO
262.52	2.	Does the plan describe arrangements made with emergency response personnel?	(YES) NO

3. Does the plan list the name(s), home address, and phone number(s) of the designated emergency coordinator(s)? (YES) NO

265.55 4. Is an emergency coordinator available at all times? (YES) NO

5. Does the plan include a list of all emergency equipment at the facility, its location, a physical description of each item on the list, and a brief outline of its capabilities? (YES) NO

6. Does the plan include an evacuation plan for facility personnel? (YES) NO

Contingency plan and emergency procedures requirements:

[X] Adequate [ ] Inadequate

J. Manifest System, Recordkeeping, and Reporting

265.71 1. Does the facility receive waste from off-site? (YES) NO

a. If yes, does the owner/operator sign and date each copy of the manifest and give a signed copy to the transporter? (YES) NO

b. Does the owner/operator send a signed copy of the manifest to the generator within 30 days of the delivery? (YES) NO

c. Does the owner/operator retain a copy of manifest? (YES) NO

2. Does the facility receive any waste from a rail or water (bulk shipment) transporter? YES (NO)

a. If yes, is the shipment accompanied by a shipping paper containing the appropriate information? YES NO

1. If yes, does the owner/operator sign and date the shipping paper and provide the transporter with a copy? YES NO

2. Does the owner/operator send a signed copy of the shipping paper to the generator within 30 days of the delivery? YES NO

3. Does the owner/operator retain a copy of the shipping paper? YES NO

265.72 3. Has the facility received any shipments of waste which were inconsistent with the manifest? YES NO

a. If yes, was an attempt made to reconcile the discrepancy with the generator and transporter? (YES) NO NA

1. If no, was the Regional Administrator notified? YES NO (NA)

265.73 4. Does the owner/operator keep a written operating record at the facility? (YES) NO

a. If yes, does the operating record include:

1. A description and the quantity of each hazardous waste received, and method(s) and date(s) of its treatment, storage, and disposal? (YES) NO N

2. The location of each hazardous waste within the facility and the quantity at each location? (YES) NO N

3. Records and results of waste analyses? (YES) NO N

4. Reports and details of incidents requiring implementation of the contingency plan? YES NO (N

5. Records and results of required inspections? (YES) NO N

6. Monitoring, testing, or analytical data? (YES) NO N

7. Closure cost estimates (and for disposal facilities, post-closure cost estimates)? (YES) NO N

265.76 5. Has the facility received any waste, which does not fall under the small generator exclusion, not accompanied by a manifest or shipping paper? YES (NO)

a. If yes, was an unmanifested waste report submitted to the Regional Administrator? YES NO (

Manifest system, recordkeeping, and reporting requirements:

[X] Adequate [ ] Inadequate

K. Closure and Post-Closure

265.112 1. Does the owner/operator have a written closure plan for the facility? (YES) NO

a. If yes, does the plan include:

1. A description of how and when the facility will be closed? (YES) NO

2. description of the steps necessary to completely close the facility? (YES) NO

3. An estimate of the maximum inventory of wastes in storage or in treatment at any given time during the facility life? (YES) NO

4. A description of the steps needed to decontaminate facility equipment at the time of closure? (YES) NO

5. An estimate of the expected year of closure and a schedule for final closure which includes the total time required to close the facility and the time required for intervening closure activities which allow tracking closure progress? (YES) NO

265.118 2. If the facility is a disposal facility, does the owner/operator have a written post-closure plan? YES NO (N

a. If yes, does the plan include:

1. Ground-water monitoring activities and frequencies at which they will be performed? YES NO (N

2. Maintenance activities and frequencies at which they will be performed to ensure the integrity of the cap and containment structures where applicable, and the function of the monitoring equipment? YES NO (

3. The name, address, and phone number of the person or office to contact during the post-closure period? YES NO (

Closure and post-closure requirements:

[X] Adequate [ ] Inadequate

L. Financial Requirements

265.142 1. Does the owner/operator have a written estimate of the closure cost? (YES) NO

265.143 2. Has the owner/operator established financial assurance for facility closure and notified the Regional Administrator? (Required after 7-6-82). (YES) NO

265.144 3. If the facility is a disposal facility, does the owner/operator have a written estimate of the annual cost of post-closure monitoring and maintenance of the facility? YES NO

265.145 4. Has the owner/operator of the disposal facility established financial assurance for post-closure care and notified the Regional Administrator? (Required after 7-6-82) YES NO (NA)

265.147 5. Has the owner/operator obtained liability insurance for sudden occurrences of at least $1 million with an aggregate of at least $2 million exclusive of legal defense costs? (Effective 7-15-82). (YES) NO

6. If the facility is a disposal facility, has the owner/operator obtained liability insurance for nonsudden and accidental occurrences of at least $3 million per occurrence with an annual aggregate of at least $6 million exclusive of legal defense costs? (Effective 7-15-82) YES NO (N)

Financial requirements:

[X] Adequate [ ] Inadequate

M. Management of Containers

265.170 1. Are containers presently used to store hazardous waste? (YES) NO

a. If no, do not complete questions 2-5.

b. If yes, check condition of containers and for evidence of incompatibility of waste with containers.

Condition of Containers:

[ ] Adequate [X] Inadequate [ ] Not Applicable

265.173 2. Are all containers holding hazardous waste closed during storage except when necessary to add or remove waste? (YES) NO

265.174 3. Does owner/operator inspect areas where containers are stored, at least weekly, for signs of leakage and/or deterioration caused by corrosion or other factors? (YES) NO

265.176	4.	Are containers holding ignitible or reactive waste located at least 15 meters (50 feet) from the facility's property line?	(YES) NO
265.177	5.	If waste in containers is incompatible with other materials stored nearby, in other containers, piles, open tanks, or surface impoundments, are the containers separated from the other materials by means of a dike, berm, wall, or other device?	(YES) NO

Management of Containers:

[X] Adequate [ ] Inadequate [ ] Not Applicable

Note: Determine if owner/operator claims any information confidential.

Note: Fill out applicable checklists for specific facility types (i.e. tanks, surface impoundments, piles, land treatment, landfills, groundwater monitoring).

Additional Information and CONCLUSIONS

Form: TSD 4/82

Kansas Department of Health and Environment
Bureau of Waste Management
Forbes Field, Topeka, Kansas 66620
(913) 296-1600

Tank Inspection Checklist

Owner Information

Date 9-10-91 EPA I.D. No. KSD007246846

Facility Name Hydrocarbon Recyclers, Inc.

Street 2549 N. New York

City Wichita, Kansas Zip 67219

Tank Information

	Tank #1	Tank #2	Tank #3
Description:	SEE ATTACHED SHEET.		
Capacity:			
Substance Stored:			
Waste Code:			
Location:			

Existing Tank System(s)

I. Is the tank(s) labeled with the words "Hazardous Waste"? (K.A.R. 28-31-4) (Yes) No

II. If the tank(s) is not covered, does it have at least 2 feet (60 cm) of freeboard unless equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would provide? (40 CFR 265.192(c)) Yes No (NA)

III. Is the tank(s) equipped with a waste-feed cutoff or bypass system(s) as required by 40 CFR 265.192(b and d)? (Yes) No

IV. Are daily inspections made of all systems pertinent to the proper operation of the tank? (Yes) No

A Discharge and cutoff systems? (Yes) No NA

B. Tank level and freeboard? Yes No (NA)

C. Drainage systems? Yes No (NA)

D. Above-ground portions for c[redacted]sion? (Yes) No NA

E. Monitoring and leak detection equipment? (Yes) No NA

F. Secondary containment? (Yes) No NA

V. Are these inspections documented in a log? (Yes) No

A. In the case of a permitted T/S/D facility, do they follow the inspection schedule outlined in their permit? (Yes) No NA

VI. Has the tank(s) been used to treat or store wastes substantially different from previous wastes or have substantially different treatment processes been used in the tank(s)? Yes (No)

A. If yes, were waste analyses and trial treatment or storage tests conducted prior to implementing the proposed changes and is all the data kept on file in the facility operating record or was written, documented information on similar storage or treatment process changes obtained prior to implementing the proposed changes and is all documentation kept on file in the facility operating record? Yes No (NA)

VII. With the exception of emergency situations, have ignitable or reactive wastes been placed in the tank(s) by the facility? (Yes) No NA

A. If yes, has the facility insured the safety of the operation by one or both of the following methods (40 CFR 265.98)?

1. Was the waste treated immediately before or after being placed in the tank(s) so that it is no longer ignitable or reactive and such treatment is done in compliance with the safety requirements of 40 CFR 265.15(b)? Yes (No) NA

2. Was the waste stored or treated under protected conditions eliminating the possibility of ignition or reaction? (Yes) No NA

VIII. If a covered tank(s) is used to treat or store ignitable or reactive wastes, does the facility meet the NFPA buffer zone requirements? (40 CFR 265.198(b)) (Yes) No NA

IX. If incompatible waste materials are placed in the same tank(s) or are put in a contaminated tank(s), is this done under completely controlled and safe conditions as specified in 40 CFR 265.199? Yes No (NA)

X. If the tank(s) has cathodic protection systems, is it inspected according to the following schedule (40 CFR 265.195(b))? Yes No (NA)

A. Was proper operation confirmed within 6 months of installation and annually thereafter? Yes No (NA)

B. Are induced current sources inspected/tested at least bimonthly? Yes No (NA)

C. Are records maintained of these inspections? Yes No (NA)

XI. Was the tank(s) used for the management of hazardous waste prior to July 14, 1986? (Yes) No NA

A. If yes, does the tank system(s) have secondary containment? (Yes) No NA

B. If no, has a written assessment that attests to the integrity of the tank(s) been prepared by an independent registered engineer? (Yes) No NA

If yes, did the assessment include the following:

1. Design standards according to which the tank and ancillary equipment were constructed? (Yes) No

2. Existing corrosion protection measures? Yes No (NA)

3. Hazardous characteristics of the waste to be handled? (Yes) No

4. Documented age of the tank system (if available) or estimate of the age? (Yes) No

5. Results of a leak test, internal inspection, or other tank integrity examination? (If the results of this test show the tank to be leaking or unfit for use, the owner must implement 40 CFR 265.196.) (Yes) No

6. Is the leak test conducted annually by an independent, qualified, registered engineer? (40 CFR 265.193(i)(1) and (2)) (Yes) No

7. Are records of the assessment results maintained on file at the facility? (Yes) No

Schedule date when secondary containment is required per schedule in 40 CFR 265.193(a) (1 through 5). _____

Existing Tank System(s)	☒ Adequate	☐ Inadequate

New Tank System(s)

XII. Is the tank system(s) required to have secondary containment (new system or according to schedule in 40 CFR 265.193(a)(1 through 5)? (Yes) No

A. If yes, has the owner or operator requested a variance from the secondary containment? (40 CFR 265.193(g and h) Yes (No) NA

B. If yes, does the secondary containment meet the following minimum requirements? (40 CFR 265.193(b and c)

1. Constructed of or lined with materials compatible with the waste and of sufficient strength? (Yes) No NA

2. Placed on a structurally adequate foundation? (Yes) No NA

3. Provided with a leak detection system capable of detecting releases within 24 hours? (Yes) No NA

4. Adequately sloped or designed and operated to drain and remove liquids from leaks, spills or precipitation? (Yes) No NA

C. If yes, does the secondary containment include one of the following: (40 CFR 265.193(d))

1. External liner? Yes (No) NA

2. Vault? (Yes) No NA

3. Double-walled tank? Yes (No) NA

4. Equivalent device approved by the Secretary? Yes No (NA)

D. If yes, does the secondary containment satisfy the following requirements? (40 CFR 265.193(e))

For External Lines and Vaults

1. Adequate capacity to contain 100% of the largest tank within its boundary? (Yes) No NA
2. Designed or operated to prevent infiltration of precipitation into the containment system unless it has adequate capacity to contain a 25 year, 24 hour rain event? (Yes) No NA
3. Free of cracks or gaps? (Yes) No NA
4. Completely surrounds the tank and surrounding earth likely to be exposed to waste if a release occurs? (Yes) No NA

For Vaults

1. Constructed with chemical-resistant water stops at all joints? (Yes) No NA
2. Provided with an impermeable coating or lining over the concrete? (Yes) No NA
3. Protected against vapor ignition, if required due to the waste characteristics? Yes No (NA)
4. Provided with an exterior moisture barrier? Yes No (NA)

For Double-Walled Tanks

1. Designed as an integral structure for containment of releases? Yes No (NA)
2. If metal, is it protected from corrosion, if metal? Yes No (NA)
3. Provided with a built-in continous leak detection system capable of detecting releases within 24 hours? Yes No (NA)

XIII. Is ancillary equipment provided with adequate secondary containment? (40 CFR 265-193(f)) (Yes) No NA

XIV. Has the tank system or secondary containment system had a leak or spill or was it determined to be unfit for use? Yes (No) NA

A. If yes, was it immediately removed from service and appropriate follow-up actions taken as required by 40 CFR 265.196 (b through e)? Yes No (NA)

XV. If extensive repair has been conducted on the tank system was it recertified in accordance with 40 CFR 270.11(d) and such certification submitted to the Secretary within 7 days? (40 CFR 265.196(f)) Yes No (NA)

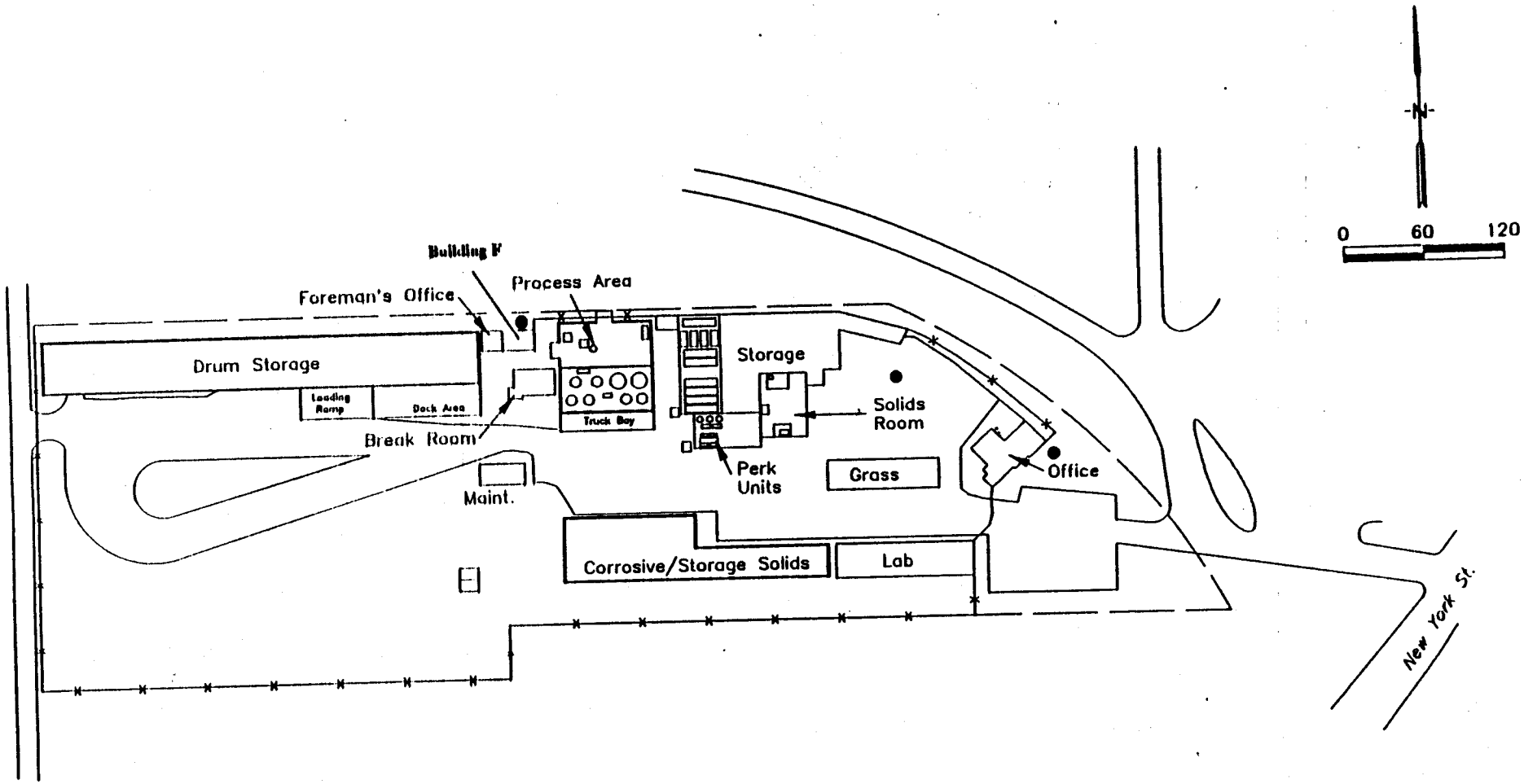
New Tank System Requirements	☒ Adequate	☐ Inadequate

Comments: _____

4.89

Hazardous Waste Tank Storage (S02) Service[1]

VESSEL	CAPACITY - WORK (gal)	CAPACITY - MAX (gal)	LOCATION
V-1	7,181	7,363	Process Area
V-2	7,084	7,084	Process Area
V-3	7,181	7,363	Process Area
V-4	7,181	7,363	Process Area
V-5	20,895	20,895	Process Area
V-6	20,895	20,895	Process Area
V-7	7,181	7,363	Process Area
V-8	7,181	7,363	Process Area
V-9	5,078	5,078	Building D
V-10	5,078	5,078	Building D
V-11	5,078	5,078	Building D
V-12	5,078	5,078	Building D
V-13	5,078	5,078	Building D
V-14	5,078	5,078	Building D
V-15A	2,659	2,659	Building D
V-15B	2,659	2,659	Building D
V-15C	2,659	2,659	Building D
V-15D	2,659	2,659	Building D
V-16	9,028	9,028	Building D
V-17	522	522	Process Area
V-18	489	489	Building D
V-26	1,129	1,155	Process Area
V-29	90	90	Building D
V-30	90	90	Building D
V-31	115	115	Building D
V-32	115	115	Building D
V-34	539	539	Process Area
TOTAL	138,000	138,936	N/A



HYDROCARBON RECYCLERS, INC. dba USPCI

(Wichita, Kansas)

SITE PLAN

Background Sample Locations ●

Attachment 1

Attachment 2

SOP No. FR002A

Attachment No. 1

JOINT RCRA OVERVIEW INSPECTION CHECKLIST

Date of Inspection: 7/28/92

Facility Name/Location: Hydrocarbon Recyclers, Inc.
2549 N. New York
Wichita, KS 67219

Facility Phone Number: (316) 268-9490

Facility EPA/State ID Number(s): KSD007246846

Facility Cassification: ☒ Generator ☐ Transporter ☒ TSD acility
☐ Resource Recovery Facility

Participants:	Name	Title
Facility:	Steve Kerbs	Facility Manager
	Ron Robertson	Safety & Env. Mgr.
State:	Teresa Hansen	Environmental Technician
	Sew Kour	Environmental Engineer
EPA:	Kris Goschen	Environmental Scientist

INSPECTION EVALUATION (S = Satisfactory, U = Unsatisfactory)

		Remarks/suggestions for improvement
S	Preparation for Inspection	See Report
U	Inspection Tools	
U	Entry Procedures	
S	Facility Information Verification	
S	Records Check	
S	Site Inspection	
S	Documentation	
S	Outbriefing	
S	Inspection Technique	

Comments:

SECTION A - Preparation for Inspection

	YES	NO	N/A
1. Reviewed following facility information/files	✓		
a. Notification	✓		
b. Part A Applications and/or permit	✓		
c. Previous inspection reports	✓		
d. Letters, correspondence, misc.	✓		
2. Had coordinated with EPA/other state personnel	✓		
3. Was knowledgeable of regulations	✓		
4. Had performed previous RCRA inspections	✓		
5. Was overall familiar with facility	✓		
6. Had inspected this facility previously	✓		
7. Had contacted facility to provide notification of inspection		✓	

Comments:

SECTION B - Inspection Tools

1. Adequate individual safety equipment	✓		
2. Brought camera and film	✓	✓	
3. Brought copy of regulations	✓		
4. Brought copies of appropriate checklists	✓		
5. Brought files on facility	✓		
6. Brought adequate writing material	✓		
7. Field NOV (if applicable)			✓

Comments:
2. She did not have extra film available after she ran out. I provided her with film so she could complete her inspection

SECTION C - Entry Procedures

1. Did inspector attempt to contact designated official/representative?	✓		
2. If designated official/representative was not available, did inspector determine that spokes-person was authorized to speak for facility?			✓
3. Was facility provided prior notification of inspection by inspector?		✓	
4. If entry was denied, did inspector follow established state procedure?			✓
5. Did inspector present his credentials?	✓		
6. Did inspector explain authority for inspection?		✓	
7. Did inspector explain reason for inspection?	✓		
8. Did inspector explain facility's confidentiality rights?	✓		
9. Did inspector explain how the inspection would proceed?	✓		

Comments:

6. Failed to explain authority, Sect. 3007 RCRA, to conduct inspection

SECTION D - Facility Information Verification

	YES	NO	N/A
1. Obtained information on processes/ operations at facility.	✓		
2. Identified and quantified all wastes generated.	✓		
3. Wastes were properly classified.	✓		
4. Method of determining hazardous waste was esabl shed.	✓		
5. Methods of handling and disposal of wastes are determined.	✓	✓	
6. Information contained in notification, Part A application and/or permit was verified	✓		

Comments:

SECTION E - Records Check

1. Did the inspector inspect and evaluate the following records in detail?			
a. Manifests	✓		
b. Inspection records	✓		
c. Operating records	✓		
d. Waste Analyses	✓	✓	✱
e. Personnel Training records	✓		
f. Annual reports	✓		
2. Did inspector inspect and evaluate the following plans/programs to determine compliance with requirements?			
a. Preparedness and prevention	✓		
b. Contingency plan		✓	
c. Groundwater Monitoring		✓	
d. Closure/post-closure		✓	
e. Financial assurance/liability		✓	
3. Did inspector utilize appropriate checklists?	✓		
4. Did inspector obtain photocopies?	✓		

Comments:

✱ 1. Waste Analysis Plan was not evaluated in detail for TCLP & Subpart BB requirements.

SECTION F - Site Inspection

1. Did inspector visually inspect and fully evaluate each area of the facility were hazardous wastes are generated or managed?	✓		
2. Were photographs taken to document deficiencies or violations?	✓		
3. Did inspector obtain or make sketch of facility?	✓		

Comments:

SECTION G - Documentation of Inspection

	YES	NO	N/A
1. Did inspector take adequate notes?	✓		
2. Did inspector obtain photocopies of specific records, reports, etc. to document deficiencies?	✓		
3. Did inspector complete applicable checklists to document results of inspection?	✓		
4. Did inspector take photographs to document observations?	✓		

Comments:

SECTION H - Outbriefing

1. Did inspector explain deficiencies/ violations to responsible official?	✓		
2. Was a Notice of Violation issued?			✓
a. Were all deficient items noted?	✓		
b. Were regulatory cites correct?	✓		
3. Did inspector require facility to take any actions to correct deficiencies?	✓	~~✓~~	
4. Did inspector adequately address any questions from facility?	✓		
5. Were receipts provided for materials received on-site?			✓

Comments:
3. Overpack leaking containers

SECTION I - Inspection Technique

	✓		
1. Did inspector avoid leading questions?			
2. Did inspector use probing questions to obtain information?	✓		
3. Was inspector thorough in his/her inspection?	✓		
4. Did inspector interpret regulations properly?			
5. Were all regulatory requirements reviewed and evaluated?	✓*		
6. Did inspector effectively determine facility's Compliance status?	✓		

Comments:

Attachment 3

D Building -

Oakite parts cleaner - Product.
3 drums labeled non-haz. waste.

3- Sm. overpacks - storage
Labeled non-haz. waste.

1- salvage

1 - RQ waste Mercury Metallic ORM-B
3-12-91 Accumulation start date.
5 gallon container

? Waste Insecticide Dry - Bromide Non-reg.

1 - RQ waste Mercury Metallic (5 gallon)
no date

1 - RQ waste Mercury Metallic -
accum. date 4/92 only
(no day)

U151 Code - No disposal
Outlet

2

1 - 55gal. Haz Waste solid NOS
Accum. date 3-11-91
Shredded 6-12-92

redoing N. side of Bldg D.

using USA waste code.

Sheppard AFB, Wichita Falls, TX

Apache Corp. Lipscomb County TX

Bethleham Aparatus, Pennsylvania.

Cracking of floor (D100)

SE end of bldg - Cut out floor. & Rob R. said they Can't get coating to stay

3

Tank Storage -

processing area

4 - fuel blend

4 - waste thru

8-3 thru 7-92
Closed to redo the floor. Coating wearing off of areas ~~that~~ where the floor troughs were filled in.

Drum washer rinsates. - #2 Diesel.
emptied 1 x week. -

Drum scraper - cleaned end of every shift
floor dry - used for kiln fuel.

4

Debris from Bldg F - to Lorement.

Building C

Cracks in floor

C701 - 3rd. drum E.
Cryptalizing at bottom.
label & not visable

5th - E
Crystalization

W 4th.
~~No.~~ lable not visable

900-1000 drums

170 dock

C 701 - serverly dented
C715 - " "
C725 - "
C727 " / leaking

5 . .

Bldg. B.

55 gal. Welch Plaza Cleaners
severly dented.

floor chipped - needs coating.

6

3-591 Ron's latest training → Conducts all Employee training

Manifests & LDR

? ★ Questions on waste received from Broker.
When it is remanifested, the manifest # is changed — LDR does not correspond w/ new manifest number. —

C/P James Hamilton no long there. — Replace w/ Joe Dawley.

KS ★ 9

Manifest #1 92002 5/14/92
To Van Waters & Rogers From Byron Original Inc. IAD 182163527
~~State~~ Omaha NE [redacted]

→ VWR 92037 to HRS
LDR Notice ~~did not~~ had 92002 # & not the required 92037 VWR #. 5/26/92

KS

Bldg. D. (OSHA Reg all prod. to be labeled w/ product name.)

Product drums labeled non-haz. waste. —

all w/ Topeka

Mercury Metallic > 1yr. storage. Need to submit documentation to Topeka on attempt to find a disposal facility.

Cracking on floor - Date of repair * Comment - as long as they remain interm. states.)

Tank area to be closed Aug. 3 through 7 to be re-sealed where needed. trough area

Bldg. C

C701 - 2 drums w/ Crystalization On bottom

C701 C715 C725 C727 - Severely dented.

C727 - 1 leaking or spillage (?)

Bldg. B floor cracked

severely dented drum. - perc. wastes

→ Ron's training > 1 yr. ago
3-5-91 latest date.

C/P changes. on Emergency Coordinator. — When will the changes be submitted w/ Part B. →

Questions on Broker Shipments.
will talk w/ Joe
more specific cross reference from new manifest and old manifest & LDR.

Attachment 4

POLLUTION PREVENTION WORKSHEET

1. Do the manifests used by the facility certify that a pollution prevention program is in place (specific wording listed under 40 CFR 262 Appendix): Yes ✓ No ___ Further Explanation: _____

2. Does the facility biennial report contain a description of pollution prevention efforts and achievements (specific requirements listed under 40 CFR 262.41 a.6 & a.7, 264.75 h & i, and 265.75 h & i): Yes ___ No ___ Further Explanation: _____

3. If facility is a permitted TSD, does the operating record contain an annual certification that a pollution prevention program is in place (specific wording listed under 40 CFR 264.73 b.9): Yes ___ No ___ N/A X Further Explanation: Not Permitted

4. Does the facility have a written pollution prevention program: Yes ___ No X Further Explanation: _____

IF YES, ATTEMPT TO OBTAIN A PHOTOCOPY; COPY ATTACHED: YES ___ NO X

5. If the facilty does not have a written pollution prevention program, does the facility have an unwritten program that can be verbally described: Yes X No ___ N/A ___ Further Explanation: _____

SUMMARY OF VERBAL DESCRIPTION: Shreed & grind all waste pallets & plastics for energy recovery. Use burnable absorbants

NOTE: THERE IS NO REQUIREMENT FOR A POLLUTION PREVENTION PROGRAM TO BE WRITTEN, AND SPECIFIC REGULATORY CRITERIA HAVE NOT BEEN ESTABLISHED FOR POLLUTION PREVENTION PROGRAMS. THE INSPECTOR SHOULD NOT CONDUCT A TECHNICAL REVIEW OF WRITTEN OR VERBAL PLANS.

6. If the facility has a written or verbal pollution prevention program, is this program actually being implemented: Yes ✓ No ___ Further Explanation: _____

7. Is facility complying with any additional pollution prevention requirements established by a permit or enforcement action: Yes ___ No ___ N/A ✓ Further Explanation: _____

8. ENCOURAGE THE FACILITY TO BEGIN/CONTINUE POLLUTION PREVENTION EFFORTS: Accomplished ___

9. PROVIDE THE FACILITY WITH THE FOLLOWING INFORMATION:

Appropriate Fact Sheet(s): Accomplished ✓
(Multimedia plus industry specific if appropriate)
State Contact Information: Accomplished ✓
Clearinghouse Information: Accomplished ✓

Done 8-7-92 VEP

AUG 7 1992

MEMORANDUM

SUBJECT: Transmittal of Inspection Report - RCRA

FROM: John W. Bosky
Chief, RCRA Monitoring Section, EMCM/ENSV

TO: Thomas F. Hogan
Chief, IRMS/PSBR/WSTM

This memorandum transmits the following compliance monitoring inspection report performed by the RCRA Monitoring Section, Environmental Monitoring and Compliance Branch, Environmental Services Division. The inspection was a Level I MMI. The primary media was RCRA and the secondary SPCC.

Facility	EPA ID Number	Activity No	Potential Areas of Non-Compliance
Hydrocarbon Recyclers, Inc. Wichita, KS	KSD007246846	AKF88	- Leaking Containers - Dented Containers - Personnel Training - LDR Storage >1yr. - Contingency Plan

Attachments

kgoschen:08/04/92
EMCM KG 8/4/92 EMCM JWB 8/4/92 EMCM JWB for TFH 8/4/92

REPORT OF JOINT RCRA OVERVIEW INSPECTION

AT

HYDROCARBON RECYCLERS, INC.

WICHITA, KANSAS

EPA I.D. NUMBER: KSD007246846

JULY 28, 1992

BY

U.S. ENVIRONMENTAL PROTECTION AGENCY
Region VII
Environmental Services Division

INTRODUCTION

At the request of the Waste Management Division (WSTM), a RCRA Joint Overview Inspection (JOI) was performed at Hydrocarbon Recyclers, Inc. on July 28, 1992. This inspection was performed with the Kansas Department of Health and Environment (KDHE) as a means of evaluating the effectiveness, reliability, and completeness of the state's procedures in the administration and enforcement of their hazardous waste management program established pursuant to Section 3006 of the Resource Conservation and Recovery Act (RCRA), as amended. A Level I Multi-Media Screening Inspection, secondary media SPCC, was completed while at the facility (please refer to Multi-Media report file for inspection results). This narrative report and attachments present the results of the inspection.

PARTICIPANTS

Hydrocarbon Recyclers, Inc. (HRI):
Stephen M. Keiter, Facility Manager
Ronald K. Robertson, Facility Safety and Compliance Officer
Site Address: 2549 N. New York
Wichita, KS 67219
(316) 268-9496

Kansas Department of Health and Environment (KDHE):
Teresa Hansen, Environmental Technician
Siew P. Kour, Environmental Engineer

U.S. Environmental Protection Agency (EPA):
Kristan C. Goschen, Environmental Scientist

FACILITY DESCRIPTION

HRI is a hazardous waste management facility which receives

hazardous waste from a variety of off-site facilities. HRI engages in the on-site treatment and storage of this waste and in the shipment of this waste to its ultimate disposal site. The following major on-site waste management activities take place at HRI: 50% of all incoming waste is blended into hazardous waste fuel for cement kilns (Systec, Continental, and Pat Chemical, etc.), 30% of all incoming waste is repackaged for incineration (Rollins, Ensco, Ross, etc.), the remaining 20% of the incoming waste consists of wastewaters which are either deep well injected (Gibraltar, etc.) or used as cement kiln make-up water. Additional information about the facilities waste generation and management activities is contained in the facility's December 16, 1991 Part A and Part B application (EPA files), and in the Sept 10, 1991 KDHE inspection report (Attachment 1).

HRI currently employees 37 people in their waste management activities and they operate two 12 hour shifts per day, five days per week.

INSPECTION FINDINGS AND OBSERVATIONS

During the inspection the State inspector noted the following observations and apparent regulatory violations:

1. HRI is regulated as an EPA generator, eg. >1000kg/mo, under Kansas regulation K.A.R 28-31-8. They also have interim status for the treatment and storage of hazardous waste and are subject to K.A.R. 28-31-8. The facility is also subject to the requirements for a hazardous waste fuel marketer, K.A.R. 28-31-8b. The inspection was conducted based on the above regulations.

a. It should be noted that I briefly reviewed the facilities compliance with the 40 CFR 265 Subpart BB requirements while at the facility. Kansas is currently not authorized for this portion of the RCRA regulations. No significant problems were noted during my review.

2. Ms. Hansen reviewed the waste streams identified during the previous inspection and noted the following changes: The tetrachloroethylene contaminated carbon scrubber filters used by the facility were now being incinerated by Rollins, Dear Park, TX, instead of being sent to Systec, Fredonia, KS; The facility's characteristic corrosive wastes are either land filled at USPCI's Lone Mountain, OK, facility or, if they carry listed waste codes, incinerated by Ensco or Rollins; The waste oil received by the facility in no longer sent to Systec as waste oil but is now blended into the hazardous waste fuel. No other significant changes were noted in the facility's waste generation or management activities.

3. Ms. Hansen reviewed the following facility records for the specific items noted: The personnel training records to verify

that facility personnel were trained annually or within six months of employment; The contingency plan to determine if the emergency coordinators were current; The inspection logs; The manifests, both incoming and outgoing and; The Biennial reports.

In addition to reviewing the records or portions of records identified above, Ms. Hansen verified that the facility maintained the closure/post-closure plan, waste analysis plan, financial assurance records, and liability insurance records required by TSDF's on-site. Ms. Hansen did not review of the contents of these records during the inspection. Ms. Hansen had conferred with Ms. Kour (the State permit writer) prior to the inspection and a determination was made not to conduct a thorough review the records on-site, except for the items noted above, since Ms. Kour was conducting an on-going review of the facility's Part B.

Observations noted by Ms. Hansen during the records review include:

a. Mr. Robertson, Facility Safety and Compliance Officer, provides much of the personnel training at the HRI, however there were no records to show that Mr. Robertson had received his annual personnel training per 40 CFR 265.16.

b. The contingency plan failed to be up-dated with the name of the current emergency coordinators. Mr. Joe Dowdey replaced Mr. James Hamilton as one of the emergency coordinators when Mr. Hamilton ceased being employed at HRI. The contingency plan was not up-dated to reflect this change per 40 CFR 265.52.

c. No apparent problems were noted with the inspection records.

d. A review of the manifests and LDR notices revealed that the LDR notice for one off-site generated manifest, a shipment of waste from Byron Originals Inc. to Van Waters and Rogers on manifest #92002, dated 5/14/92, and subsequently shipped from Van Waters and Rogers to HRI on manifest #92037, dated 5/26/92, failed to note the second manifest number (#92037) on the LDR notice. Ms. Hansen told Mr. Keiter that she the LDR notices need to have the correct manifest number on them and that she would review the procedures for managing brokered waste shipments and comment on the compliance status of this LDR notice in her report.

e. No apparent problems were noted with the Biennial Reports.

4. Ms. Hansen did a visual inspection of all areas of the facility where hazardous wastes were generated or managed. She noted the following observations:

a. There were three drums and three small containers of cleaning products used by HRI in Building D. HRI had labeled this material with the words "NON-HAZARDOUS WASTE." Mr. Keiter said that HRI routinely labels materials which are products as non-hazardous waste. Ms. Hansen suggested that it would be a better management practice if these containers labels did not include the word "waste" in the label name.

b. Two 5-gallon containers of metallic mercury waste, with waste code U-151, were stored over one year. Mr. Keiter said that there were no facilities in the U.S. which could dispose of the mercury waste if it carried the U-151 waste code. He said that the waste code is used by Sheppard Air Force Base, Wichita Falls, TX. Mr. Keiter said that Sheppard AFB managed all of their mercury waste as U-151 even though it was a spent material and should be classified as D009 waste. Mr. Keiter said that he had discussed this matter with them and that they refused to change the wastes classification. Ms. Hansen reviewed file information which showed that HRI had contacted the major mercury recyclers/disposers in an effort to properly manage this shipment of waste. Ms. Hansen noted that it appeared that HRI had no alternative but to store this waste until disposal or treatment is available for the U-151 waste code.

c. Three drums of hazardous waste were found leaking and three drums were found severely dented in Building C. Building C is an interim status container storage area and the containers need to be stored in compliance with 40 CFR 265 Subpart I. Another severely dented drum of waste was observed in Building B.

d. No apparent problems were noted in the waste processing area or with the hazardous waste storage tanks.

e. No apparent problems were noted with the emergency and spill control equipment.

5. A NOV was not issued during the inspection per KDHE procedures.

DISCUSSION OF INSPECTION

The following discussion and comments are provided as the basis for evaluating the performance of the state inspector during the inspection.

Preparation for Inspection

1. Ms. Hansen had thoroughly reviewed HRI's file material prior to the inspection.

2. Ms. Hansen had the majority of the necessary equipment and supplies, e.g., checklists, copies of regulations, safety

equipment, note pads, camera, etc., to adequately conduct the inspection.

Comments:

Ms. Hansen had arranged the necessary equipment to conduct the inspection prior to leaving her office. However, upon reaching the site and taking a few photographs, she realized that she did not have enough film left in her camera to adequately document her additional observations. I explained to her the need to carry extra film, camera batteries, etc. during the inspection, and the fact that adequate photo documentation is an essential part of the inspection process. I provided Ms. Hansen with the necessary film and she documented all observations.

Entry Procedures

1. The inspection was conducted during normal business hours and on an unannounced basis.

2. Ms. Hansen took the lead role in conducting this inspection.

3. Upon arrival at the facility Ms. Hansen contacted Mr. Keiter and Mr. Robertson who acted as the official facility representatives during the course of the inspection. Ms. Hansen, and I presented our credentials and Ms. Hansen explained the purpose, and scope of the inspection. She explained that the inspection would consist of a discussion of facility operations, waste generation and waste management practices, a review of the required hazardous waste management plans, programs and records, and a visual inspection of the hazardous waste management areas. Ms. Hansen also informed the facility of their right to make a confidential business information claim if they so desired.

Comments:

Ms. Hansen thoroughly explained the preliminary information to the facility representatives, however she failed to explain the authority, Section 3007 of RCRA, under which the inspection was conducted. I explained to Ms. Hansen that the initial briefing is an important part of the inspection and each of the above noted items needs to be fully explained the facility representatives.

Facility Records Check

1. Ms. Hansen verified that all waste streams were properly identified and determined the compliance status of the required records or portions of records and documents which she reviewed. Ms. Hansen first reviewed the generator status of the facility and noted all changes since the last inspection. An

inspection checklist was used during this portion of the inspection. All apparent violations were documented through photocopies and notes.

Comments:

I suggested to Ms. Hansen that she briefly review all facility's records, including those records in which Ms. Kour was reviewing for HRI's permit, for compliance with the interim status requirements since the facility does not yet have their permit. I noted that one often finds a facility is not operating as described in their Part B submittal and that the compliance status of the facility with the interim status requirements is essential until the permit is actually issued.

Site Inspection

1. Ms. Hansen inspected all areas of the facility where hazardous wastes were generated or managed. She documented all potential or apparent violations through photographs and notes.

Comments:

Ms. Hansen did a good job inspecting the container management areas and made good use of her pre-inspection notes. I suggested that during the next inspection of HRI, she spend a little more time inspecting the tank storage areas. I also suggested that she could enhance her inspection procedures by being more independent while conducting the visual portion of the inspection. Ms. Hansen did a good job varifing that the facility's emergency eye wash stations actually functioned as designed by testing several of them.

Outbriefing

1. At the conclusion of the inspection Ms. Hansen summarized and reviewed her findings and recommendations.

Comment:

The individual significance of the apparent violation related to HRI's waste management activities were fully explained during the outbriefing. Ms. Hansen summarized each of her observations and answered all of the questions that the facility representatives had.

Summary Comments

1. Ms. Hansen conducted the inspection in a professional manner. She freely questioned facility personnel about the waste management practices and the observed regulatory problems. During the questioning process Ms. Hansen avoided using leading

questions.

2. Ms. Hansen properly evaluated the facility's waste management practices and compliance status.

3. After the facility outbriefing Ms. Hansen and I discussed the overview process and my evaluation of her inspection performance. The following additional observations are noted:

a. Ms. Hansen has conducted RCRA compliance inspection since May of 1989. She has conducted several small quantity generator inspection, 8-10 large quantity generator inspections, has accompanied other inspectors on three or four TSDF inspections, and has conducted one TSDF inspection on her own prior to this inspection.

b. Given her level of experience and the complexity of the facility, Ms. Hansen adequately conducted this inspection. Ms. Hansen showed good judgement in contacting the permit writer, Ms. Kour, to accompany her on this inspection. Ms. Hansen and Ms. Kour worked as an efficient team during this inspection.

4. A Joint RCRA Overview Inspection Checklist was completed during the inspection to document the activities of the KDHE inspector (Attachment 2). Ms. Hansen's field notes are contained in Attachment 3.

5. A Pollution Prevention Worksheet was completed and is contained in Attachment 4.

Kristan C. Goschen
Environmental Scientist
Date: 08/04/92
Activity Number: AKF88

John W. Bosky
Chief, RCRA Monitoring Section
Date: 8/6/92

Attachments:

1. 9/10/92 KDHE Inspection Report (26 pages)
2. Joint Overview Checklist (4 pages)
3. KDHE Field Notes (8 pages)
4. Pollution Prevention Checklist (1 page)

Attachment 1

Kansas Department of Health and Environment
Bureau of Air and Waste Management
Forbes Field, Topeka, Kansas 66620

Hazardous Waste Generator/ Transporter Compliance Inspection Report

General

Time 8:30 AM Date 9-10-91

Facility Name Hydrocarbon Recyclers, Inc. EPA ID No. KSD007246846

Street 2549 N. New York City Wichita, KS Zip 67219

Mailing Address (if different than above) _____

County Sedgwick Phone (316) 268-9490

Contact(s) Steve Keiter, Facility Manager

Ron Robertson,

Inspector(s) Ron Smith, Teresa Hansen, Siew Kour

Type of Business Commercial T/S/D - Hazardous Waste Fuel Marketer.

Has the company declared any information/processes as trade secrets (K.S.A. 65-3447)? Yes (No)
If yes, explain.

Industrial Wastes Generated *

(List hazardous wastes first) *Also See Attached List of Waste Codes.

~~Waste:~~	Chlorinated Solvents	Tetrachloroethylene contaminated wastes (carbon, filters) (Incinerated at Rollins & Ross Grafton)
If ~~waste~~ is hazardous, give H.W. ID Number:	F001/F002	F002
Amount generated per month:		
Amount presently in storage:		
Accumulation time:		
Present disposal method:	HRI, Tulsa, OK and HRI, San Antonio, Tx.	Systech, Fredonia, Ks.

Waste:	Flammable Wastewater	Solvent and paint solvent mixture (kiln fuel)
If waste is hazardous, give H.W. ID Number:	D001/D007/D008	D001/F003/F005
Amount generated per month:		
Amount presently in storage:		
Accumulation time:		
Present disposal method:	Gilbarco Incineration - ~~Rollins~~ Deep Well Injection	~~Systech, Fredonia, Ks.~~ or

Waste:	Oxidizers	Non-blendable Wastes
If waste is hazardous, give H.W. ID Number:	D001	D004 - D011
Amount generated per month:		
Amount presently in storage:		
Accumulation time:		aqueous cool 7 Landfill
Present disposal method:	Incineration - Rollins or Ensco.	USPCI, Lone Mountain, OK. Incineration - Rollins or Ensco. if low solvents

Waste:	Blendable Wastes for Kiln Fuel	Corrosives
If waste is hazardous, give H.W. ID Number:	D001/F001/F002/F003/F005 Approved U wastes, D004 - D011 D00 18-43	D002/D007
Amount generated per month:		
Amount presently in storage:		- if listed — Inc Ensco/Rollins
Accumulation time:		Characteristic only
Present disposal method:	Systech, Fredonia, Ks. and Heartland Cement, Independence	USPCI, Lone Mountain, OK.

Waste:	Non-hazardous waste-water	Used Oil
If waste is hazardous, give H.W. ID Number:	none	none
Amount generated per month:		
Amount presently in storage:		
Accumulation time:	Hauled off or Gilbraltar well for deep water Treatment	Blended at Plant Fuel
Present disposal method:	USPCI, Lone Mountain, OK ~~or incineration~~ System Non-H -makeup	Systech, Fredonia, Ks.

I. Has the facility evaluated all potentially hazardous waste(s) to determine if it is hazardous? (K.A.R. 28-31-4(b)) (Yes) No
   A. If waste(s) was tested, was the analysis conducted by a laboratory certified by KDHE? (K.A.R. 28-31-4(f)) (Yes) No NA
   B. If waste(s) was tested, are the results kept for three years? (K.A.R. 28-31-4(f)(1)(c))? (Yes) No NA

II. If hazardous waste(s) is disposed of via the sanitary sewer to a Publicly Owned Treatment Works (POTW) has written permission been obtained from the operator of the POTW? (K.A.R. 28-31-3/40 CFR 261.4) Yes No (NA)

Non-hazardous wastes only.

III. If industrial waste(s) is disposed of at a permitted sanitary landfill, has a disposal authorization been obtained? (K.A.R. 28-29-23) Yes No (NA)
   A. If yes, list the authorization number(s):

IV. Facility size classification:

☐ Not a Gen.	☐ Small Qt. Gen.	☐ Ks. Gen.	☒ EPA Gen.
☒ T/S/D Facility	☐ Transporter	☒ H.W. Burner/Marketer	☐ Used oil Burner/Marketer

Hazardous Waste Determination Requirements:	☒ Adequate	☐ Inadequate

Notification Requirements

V. ~~Has generator Notified KDHE~~ and obtained an EPA Identification Number? (K.A.R. 28-31-4(c)) (Yes) No NA

VI. ~~Is current Notification accurate?~~ (K.A.R. 28-31-4(e)) (Yes) No NA
   A. ~~Is this facility marketing (selling) hazardous waste as a fuel?~~ (Yes) No NA
   B. ~~Is this facility marketing (selling) used oil as a fuel?~~ Yes (No) NA
   (If yes, to either question A or B, complete Used Oil Fuel Marketers/Blenders Checklist.)
   C. Is this facility burning hazardous waste as a fuel? Yes (No) NA
   D. Is this facility burning used oil as a fuel? Yes (No) NA

Notification Requirements:	☒ Adequate	☐ Inadequate	☐ NA

(If small quantity generator, stop here.)

Manifests

VII.	Is a contractual agreement used in place of manifesting? (K.A.R. 28-31-4(c))	Yes	(No)	
	A. If yes, does the contractural agreement include the type of waste and frequency of shipments?	Yes	No	(NA)
	B. If yes, is the vehicle used to transport the waste owned and operated by the reclaimer of the waste?	Yes	No	(NA)
	C. If yes, is a copy of the agreement kept for a period of three years after termination of agreement?	Yes	No	(NA)
VIII.	Is a current manifest showing revision date and burden disclosure statement used? (K.A.R. 28-31-4(d)/40 CFR 262.20)	(Yes)	No	NA
	A. If yes, does manifest(s) include:			
	1. Generator EPA Identification Number (twelve digit) and manifest document number (five digit)?	(Yes)	No	NA
	2. Number of pages?	(Yes)	No	
	3. Generators name and mailing address?	(Yes)	No	
	4. Generators phone number?	(Yes)	No	
	5. Transporter 1 Name?	(Yes)	No	
	6. Transporter 1 EPA Identification Number?	(Yes)	No	
	7. Transporter 2 Name?	(Yes)	No	NA
	8. Transporter 2 EPA Identification Number?	(Yes)	No	NA
	9. Name and site address of designated facility?	(Yes)	No	
	10. Designated facility's EPA Identification Number?	(Yes)	No	
	11. Waste Description (DOT shipping name, hazard class, and Identification Number)?	(Yes)	No	
	12. Number and type of containers?	(Yes)	No	
	13. Total Quantity?	(Yes)	No	
	14. Unit (weight or volume)?	(Yes)	No	
	15. Special handling instructions?	(Yes)	No	NA
	16. Generators certification including waste minimization statement, generators signature and date?	(Yes)	No	
	17. Name, signature and date of transporter 1?	(Yes)	No	
	18. Name, signature and date of transporter 2?	(Yes)	No	NA
	B. Does generator retain a copy of manifest(s) signed by both generator and transporter? (K.A.R. 28-31-4(d)/40 CFR 262.23)	(Yes)	No	
	C. Does generator retain copy of manifest(s) signed and dated by T/S/D/ facility owner/operator for three years? (K.A.R. 28-31-4(f)(1)(A))	(Yes)	No	
	D. Has generator ever failed to receive a signed copy of a manifest within 45 days of initiating a shipment?	Yes	(No)	
	1. If Yes, was exception report(s) filed? (K.A.R. 28-31-4(f)(4))	Yes	No	(NA)
	2. If Yes, was copy retained for 3 years? (K.A.R. 28-31-4(f)(1)(B))	Yes	No	(NA)

Manifesting Requirements:	☒ Adequate	☐ Inadequate	☐ NA

Land Disposal Restrictions Requirements

IX. Does facility generate any wastes subject to the land disposal restrictions requirements of 40 CFR 268, Subparts B and C? List these wastes: (Yes) No

A. All Wastes. D. _____

B. _____ E. _____

C. _____ F. _____

X. Is the waste(s) covered by a National Variance(s), Extension, or Petition? (40 CFR 268 5&6) Yes (No)

A. If Yes, describe the variance, extension, or petition which applies:

_____

_____

XI. Is the waste covered by an exemption? (40CFR 268.1(c)(3)) Yes (No)

A. If yes, does the generator provide a notice with the waste to the T/S/D facility stating that the waste is exempt from the land disposal restrictions? (40CFR 268.7(a)(3)) Yes No (NA)

XII. Does generator ship waste(s) covered by the Land Disposal Restrictions off-site for treatment or disposal? (Yes) No

A. If Yes, does the generator provide a Notification to the T/S/D facility that includes: EPA hazardous waste number(s), applicable treatment standards, manifest number(s), and waste analysis data, if available? (40CFR 268.7) (Yes) No

B. If yes, is a copy of this notification kept for 5 years? (Yes) No

XIII. Does generator treat restricted waste(s) on-site so that they are below the land disposal restrictions standards? (If Yes, fill out land disposal restrictions checklist.) Yes (No)

Land Disposal Restrictions Requirements:	☒ Adequate	☐ Inadequate	☐ NA

Pre-Transport Requirements

XIV. Does generator package waste in accordance with DOT requirements? (K.A.R. 28-31-4(e)(1)) (Yes) No NA

XV. Does generator label (flammable liquid, poison, etc.) each package in accordance with DOT requirements of 49 CFR 172.101 or 172.102? (K.A.R. 28-31-4(e)(2)) (Yes) No NA

XVI. Does generator mark (consignee's or consignor's name and address, etc) on each package in accordance with DOT requirements of 40 CFR 172 Subpart D? (K.A.R. 28-31-4(e)(3)) (Yes) No NA

A. Does generator mark each container of 110 gallons or less as below? (K.A.R. 28-31-4(e)(3)) (Yes) No NA

Hazardous Waste-Federal Law Prohibits Improper Disposal.
If found, contact the nearest police or public safety authority or the U.S. EPA.

Generator's Name and Address

Manifest Document Number

XVII. Does generator have placards to offer to transporters in accordance with 49 CFR 172 Subpart F? (K.A.R. 28-31-4(e)(4)) (Yes) No NA

XVIII. Does generator only use a transporter who is properly registered with the department? (K.A.R. 28-31-4(g)) (Yes) No NA

Pre-Transport Requirements:	☒ Adequate	☐ Inadequate	☐ NA

Biennial Reports

XIX. Has generator submitted a biennial report(s) to KDHE? (K.A.R. 28-31-4(f)(2)) (Yes) No NA

A. If Yes, does generator retain copies for three years? (K.A.R. 28-31-4(f)(1)(B)) (Yes) No NA

Biennial Report Requirements:	☒ Adequate	☐ Inadequate

Special Conditions

XX. Has generator received or transported any hazardous waste to or from a foreign source? (40 CFR Subpart E) (Yes)* No

A. If Yes, has generator filed a Notice with the Secretary of Health and Environment? Yes (No) NA

B. Is waste manifested and signed by a foreign consignee? (Yes) No NA

C. If generator transports wastes out of the country, has confirmation of delivered shipment been received? Yes No (NA)

*See attached letter of explanation from facility.

Special Conditions Requirements:	☐ Adequate	☐ Inadequate	☐ NA

Storage Requirements

XXI. Does generator temporarily store waste before transport? (Yes) No

A. For 90 days or less? (Yes) No NA

B. For more than 90 days? (Yes) No NA

C. If waste is stored in containers:

1. Are containers marked with the words: "Hazardous Waste"? (K.A.R. 28-31-4(g)(3) or (h)(1)(D)) Yes (No) NA
2. Is the accumulation start date marked on each containers? (K.A.R. 28-31-4(g)(2) or (h)(1)(C)) Yes (No) NA
3. Are all containers holding hazardous waste closed during storage except when necessary to add or remove waste? (K.A.R. 28-31-4(g)(1) or (h)(1)(B)) (Yes) No NA
4. Does generator conduct weekly inspections of containers for signs of leakage and/or deterioration caused by corrosion or other factors? (K.A.R. 28-31-4(k)) (Yes) No NA

   a. If Yes, are these inspections documented in a log that includes date and time of inspection, full name of inspector, notations of observations, and date and nature of remedial actions? (K.A.R. 28-31-4(d)/40 CFR 265.15(d)) (Yes) No NA

5. Are containers holding ignitible or reactive waste(s) located at least 15 meters (50 feet) from the facility's property line? (EPA Generator and T/S/D Only) (K.A.R. 28-31-4(g)(1)) (Yes) No NA

6. If waste in containers is incompatible with other materials stored nearby, are the containers separated from the other materials by means of a dike, berm, wall, or other means? (K.A.R. 28-31-4(g)(1) or (h)(1)(B)) (Yes) No NA

7. Does generator have any satellite storage areas? (K.A.R. 28-31-4(j)) (Yes) No NA
If yes,

   a. Is the waste stored in a container at or near the point of generation and under the control of the operator of the process generating the waste? (Yes) No

   b. Is the container in good condition and closed except to add or remove waste? (Yes) No

   c. Is the container marked with the words: "Hazardous Waste"? (Yes) No

   d. Is the container marked with the accumulation start date at the time it becomes full? (Yes) No

   e. Is the full container moved to the storage area within 3 days after it became full? (Yes) No

   (If waste(s) is placed in tanks, piles, or surface impoundments complete the appropriate inspection checklist.)

Storage Requirements: ☐ Adequate ☒ Inadequate ☐ NA

Kansas Generator's Emergency Preparedness

XXII. Has facility named one employee as emergency coordinator? (K.A.R. 28-31-4(h)(1)(E)) Yes No

   A. Is the emergency coordinator available to respond to an emergency by reaching the facility within a short period of time? Yes No

   B. Is the emergency coordinator or his/her designee prepared to respond to any emergencies (fires, spills, or releases) that arise? Yes No

   C. Is the emergency coodinator familiar with the reporting requirements of K.A.R. 28-31-4(h)(2)? Yes No

XXIII. Is the following information posted next to at least one telephone which is immediately asscesssible in an emergency: (K.A.R. 28-31-4(h)(1)(F))

   A. Name and telephone of emergency coordinator? Yes No

   B. Location of fire extinguishers, fire alarms, or spill control material, if available? Yes No

   C. Telephone number of fire department unless the facility has a direct alarm? Yes No NA

XXIV. Have employee's been trained so that they are familiar with proper waste handling and emergency procedures that are relevant to their responsiblities during normal facility operations? (K.A.R. 28-31-4(h)(1)(G)) Yes No

   A. Is this training documented in any way? Yes No

Kansas Generator's Emergency Preparedness Requirements: ☐ Adequate ☐ Inadequate ☐ NA

(If Kansas generator, stop here.)

Preparedness and Prevention

XXV. If appropriate, based upon the nature and quantity of wastes generated and stored at the facility, is the facility equipped with:

A. Internal communication or alarm system easily accessible in case of emergency? (K.A.R. 28-31-4(g)(4)/40 CFR 265.32(a)) Yes No NA

B. Telephone or hand-held two-way radio capable of summoning emergency response personnel? (K.A.R. 28-31-4(g)(4)/40 CFR 265.32(b)) Yes No NA

C. Portable fire extinguisher, fire control equipment, spill control equipment, and decontamination equipment? (K.A.R. 28-31-4(g)(4)/40 CFR 265.32(c)) Yes No NA

D. Is water of adequate volume provided for hose streams, foam producing equipment, sprinklers, etc.? (K.A.R. 28-31-4(g)(4)/40 CFR 265.32(d)) Yes No NA

E. Is this equipment (A-C above) tested and maintained to assure its proper operation? (K.A.R. 28-31-4(g)(4)/40 CFR 265.33) Yes No NA

XXVI. Does a check of the facility show sufficient aisle space to allow unobstructed movement of personnel and equipment? (K.A.R. 28-31-4(g)(4)/40 CFR 265.35) Yes No NA

XXVII. If appropriate for the type(s) of waste handled, has the owner/operator made the following arrangements:

A. Familiarized the local emergency authorities with the facility, wastes handled, entrances and exits? (K.A.R. 28-31-4(g)(4)/40 CFR 265.37(a)(1)) Yes No NA

B. Designated one authority where one or more police or fire departments might respond to an emergency? (K.A.R. 28-31-4(g)(4)/40 CFR 265.37(a)(2)) Yes No NA

C. Made agreements with local emergency response teams, emergency response contractors, and equipment suppliers? (K.A.R. 28-31-4(g)(4)/40 CFR 265.37(a)(3)) Yes No NA

D. Familiarized local hospitals with the properties of hazardous waste handled and types of injuries which could result from fires, explosions, or releases at the facility? (K.A.R. 28-31-4(g)(4)/40 CFR 265.37(a)(4)) Yes No NA

XXVIII. In cases where local authorities decline to enter into such arrangements, is the refusal entered in the operating record? (K.A.R. 28-31-4(g)(4)/40 CFR 265.37(a)(b)) Yes No NA

Preparedness and Prevention Requirements: ☐ Adequate ☐ Inadequate ☐ NA

Personnel Training

XXIX. Has the owner/operator established a hazardous waste management training program? (K.A.R. 28-31-4(g)(4)/40 CFR 265.16) Yes No

A. Is the program directed by a person trained in hazardous waste management? (40 CFR 265.16(a)(2)) Yes No

B. Are new personnel trained within six months after their employment? (40 CFR 265.16(b)) Yes No

C. Are new employees supervised until training is completed? (40 CFR 265.16(b)) Yes No

D. After initial training, are employees trained on an annual basis? (40 CFR 265.16(c)) Yes No

E. Does the facility maintain the following documents and records:

1. Job title and job description for each position related to hazardous waste management? (40 CFR 265.16(d)(1) & (2)) Yes No
2. Description of type and amount of training to be given each person? (40 CFR 265.16(d)(3)) Yes No
3. Records of training given to facility personnel? (40 CFR 265.16(d)(4)) Yes No

Personnel Training Requirements:	☐ Adequate	☐ Inadequate

Contingency Plan

XXX. Does the facility have a contingency plan? (K.A.R. 28-31-4(g)(4)/40 CFR 265 Subpart D) Yes No
If yes,

A. Does the plan list the names(s), home address, and phone numbers of designated emergency coordinator(s) in the order in which they should be contacted? (40 CFR 265.52(d)) Yes No

B. Is an emergency coordinator available at all times? (40 CFR 265.55) Yes No

C. Does the plan describe emergency actions facility personnel must take to respond to fires, explosions, or releases of hazardous waste? (40 CFR 265.52(a)) Yes No

D. Does the plan describe arrangements made with emergency response agencies? (40 CFR 265.52(c)) Yes No

E. Does the plan include a list of all emergency equipment at the facility, its location, a physical description of each item on the list, and a brief outline of its capabilities? (40 CFR 265.52(e)) Yes No

F. Does the plan include an evacuation plan for facility personnel that describes signals and evacuation routes? (40 CFR 265.52(f)) Yes No

G. Have copies of the plan been provided to outside emergency response agencies and hospitals? (40 CFR 265.53) Yes No

Contingency Plan Requirements:	☐ Adequate	☐ Inadequate

(If EPA generator, stop here.)

Transporter Requirements

XXXI. Does this facility transport hazardous waste? (Yes) No
If yes,

A. Are they registered as a hazardous waste transporter in the State of Kansas? (K.A.R. 28-31-6 (b)) (Yes) No

B. Does transporter comply with the manifest requirements of 40 CFR 263.20 except 263.20(h)? (Yes) No

C. Does transporter retain a copy of the manifest for three years? (40 CFR 263.22(a)) (Yes) No

D. Does this facility transport hazardous waste subject to the manifest exemption of K.A.R. 28-31-4(d)(7)? Yes (No)
If yes,

1. Does the transporter record the name, address, and EPA ID number of the generator, quantity of waste shipped, DOT shipping information, and the date the waste was accepted in a log or shipping paper? Yes No (NA)
2. Does the transporter carry this record when transporting the waste to the reclamation facility? Yes No (NA)
3. Does the transporter retain these records for a period of three years after the termination or expiration of the agreement? Yes No (NA)

Transporter Requirements:	☒ Adequate	☐ Inadequate	☐ NA

Additional information and conclusions:

MIKE HAYDEN
Governor
JACK D WALKER M D
Secretary

STATE OF KANSAS

Forbes Field
Topeka KS 66620-0001
(913) 862-9360

DEPARTMENT OF HEALTH AND ENVIRONMENT

RCRA Compliance Inspection Report

T/S/D Facilities Checklist

A. General

Date 9-10-91 Time 8:30 AM EPA ID No. KSD007246846

Facility Name Hydrocarbon Recyclers, Inc.

Street 2549 N. New York

City Wichita, Kansas Zip 67219

County Sedgwick Phone (316) 268-9490

Contact Steve Keiter, Facility Manager

Inspector Ron Smith, Teresa Hansen, Siew Kour

Other

B. Activity at Site

Treatment	Storage	Disposal
___ Chem/Phys/Bio Treatment	X Drums	___ Incineration
___ Filtration	___ Pile	___ Landfill
___ Incineration	___ Surface Impoundment	___ Land Treatment
___ Recycling/Recovery	X Tank, Above ground	___ Surface Impound
___ Reprocessing	___ Tank, Below ground	___ Other (
X Solvent Recovery	___ Other ( )	
___ Thermal Treatment		
___ Volume Reduction		
___ Waste Oil		
___ Other ( )		

Comments: _____

C. Waste Analysis Plan

265.13

1. Does facility maintain a copy of its waste analysis plan at the facility? (YES) NO

A. If yes, does the plan include:

1. Parameters for which each hazardous waste will be analyzed and rationale for the selection of these parameters. (YES) NO

2. Test methods which are used to test for these parameters. (YES) NO

3. Sampling method used to obtain sample. (YES) NO

4. Frequency with which the initial analysis will be reviewed or repeated to ensure the analysis is current. (YES) NO

5. For off-site facilities, the waste analyses that generators have agreed to supply. YES NO

6. For off-site facilities, the procedures which are used to inspect and analyze each movement of hazardous waste received to ensure that it matches the identity of the waste designated on the manifest. (YES) NO

Waste analysis plan requirements:

[X] Adequate [ ] Inadequate

D. Security

265.14

1. Does the facility provide either of the following:

a. A 24-hour surveillance system? (T.V. monitoring or guards). YES (NO)

b. An artificial or natural barrier (fence, fence and cliff combination) and a means to control entry (attendant, T.V. monitoring, locked entrance, controlled roadway access). (YES) NO

2. Does the facility provide warning signs at entrances. (YES) NO

3. Does the facility consider itself exempt from security requirements? YES (NO)

Security requirements:

[X] Adequate [ ] Inadequate [ ] Not Applicable

E. General Inspection Requirements

265.15

1. Does the owner/operator maintain a written schedule at the facility for inspecting:

a. Monitoring equipment (YES) NO

b. Safety and emergency equipment (YES) NO

c. Security devices (YES) NO

d. Operating and structural equipment (YES) NO

2. Does the inspection schedule identify the types of problems which are to be looked for during the inspections? (YES) NO

3. Does the owner/operator maintain an inspection log? (YES) NO

a. If yes, does the log contain the:

1. Date and time of inspection (YES) NO

2. Name of inspector (YES) NO

3. Notation of observations (YES) NO

4. Date and nature of repairs or remedial action YES (NO)

Inspection requirements:

[ ] Adequate [X] Inadequate

F. Personnel Training

265.16

1. Does the owner/operator maintain at the facility, the following documents and records:

a. Job title and job description for each position related to hazardous waste management. (YES) NO

b. Description of type and amount of training to be given each person. (YES) NO

c. Records of training given to facility personnel. (YES) NO

Personnel training requirements:

[X] Adequate [ ] Inadequate

G. Requirements For Ignitable, Reactive, or Incompatible Wastes

265.17

1. Does the facility handle ignitable or reactive wastes? (YES) NO

a. If yes, is the waste separated and confined from sources of ignition or reaction, sparks, spontaneous ignition, and radiant heat? (YES) NO

2. Are smoking and open flames confined to specially designated locations? (YES) NO

3. Are "No Smoking" signs posted in hazard areas? (YES) NO

4. Does a check of these areas show any leakage or corrosion of containers? (YES) NO

5. Does a check of these areas show evidence of heat generation from interaction of incompatible wastes? YES (NO)

Ignitable, reactive, or incompatible waste requirements:

[X] Adequate [ ] Inadequate [ ] Not Applicable

H. Preparedness and Prevention

265.31 1. Does an inspection of the facility show any evidence of fire, explosion, or contamination? YES (NO)

265.32 2. If applicable to the facility, is the facility equipped with:

a. Internal communication or alarm system easily accessible in case of emergency? (YES) NO

b. Telephone, hand-held two-way radio capable of summoning emergency response personnel? (YES) NO

	3.	Are portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment provided?	(YES) NO NA
	4.	Is water of adequate volume provided for hose streams, foam producing equipment, sprinklers, etc.?	(YES) NO NA
265.33	5.	Is this equipment (1-4 above) tested and maintained to assure its proper operation?	(YES) NO NA
265.35	6.	Does a check of the facility show sufficient aisle space to allow unobstructed movement of personnel and equipment?	YES (NO) NA
265.37	7.	If appropriate for the type(s) of waste handled has the owner/operator made arrangements with the local emergency authorities to familiarize them with the layout of facility, properties of wastes handled and associated hazards, places where facility personnel normally work, entrances to roads inside facility, and possible evacuation routes?	(YES) NO N
	8.	In areas where more than one police and fire department might respond, is there one designated authority?	YES NO (N
	9.	If appropriate for the type(s) of waste handled does the owner/operator have agreements with State emergency response teams, emergency response contractors, and equipment suppliers?	YES NO (N
	10.	If appropriate for the type(s) of waste handled has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste(s) handled and types of injuries which could result from fires, explosions, or releases at the facility?	(YES) NO
	11.	In cases where state or local authorities decline to enter into such arrangements, is the refusal entered in the operating record?	YES NO (

Preparedness and prevention requirements:

[ ] Adequate [X] Inadequate

I. Contingency Plan and Emergency Procedures

262.53	1.	Is a contingency plan maintained at the facility and have copies been provided to outside agencies which may be called upon to provide emergency services?	(YES) NO
262.52	2.	Does the plan describe arrangements made with emergency response personnel?	(YES) NO

3. Does the plan list the name(s), home address, and phone number(s) of the designated emergency coordinator(s)? (YES) NO

265.55 4. Is an emergency coordinator available at all times? (YES) NO

5. Does the plan include a list of all emergency equipment at the facility, its location, a physical description of each item on the list, and a brief outline of its capabilities? (YES) NO

6. Does the plan include an evacuation plan for facility personnel? (YES) NO

Contingency plan and emergency procedures requirements:

[X] Adequate [ ] Inadequate

J. Manifest System, Recordkeeping, and Reporting

265.71 1. Does the facility receive waste from off-site? (YES) NO

a. If yes, does the owner/operator sign and date each copy of the manifest and give a signed copy to the transporter? (YES) NO

b. Does the owner/operator send a signed copy of the manifest to the generator within 30 days of the delivery? (YES) NO

c. Does the owner/operator retain a copy of manifest? (YES) NO

2. Does the facility receive any waste from a rail or water (bulk shipment) transporter? YES (NO)

a. If yes, is the shipment accompanied by a shipping paper containing the appropriate information? YES NO

1. If yes, does the owner/operator sign and date the shipping paper and provide the transporter with a copy? YES NO

2. Does the owner/operator send a signed copy of the shipping paper to the generator within 30 days of the delivery? YES NO

3. Does the owner/operator retain a copy of the shipping paper? YES NO

265.72 3. Has the facility received any shipments of waste which were inconsistent with the manifest? (YES) NO

a. If yes, was an attempt made to reconcile the discrepancy with the generator and transporter? (YES) NO NA

1. If no, was the Regional Administrator notified? YES NO (NA)

265.73 4. Does the owner/operator keep a written operating record at the facility? (YES) NO

a. If yes, does the operating record include:

1. A description and the quantity of each hazardous waste received, and method(s) and date(s) of its treatment, storage, and disposal? (YES) NO NA

2. The location of each hazardous waste within the facility and the quantity at each location? (YES) NO NA

3. Records and results of waste analyses? (YES) NO NA

4. Reports and details of incidents requiring implementation of the contingency plan? YES NO (NA)

5. Records and results of required inspections? (YES) NO NA

6. Monitoring, testing, or analytical data? (YES) NO NA

7. Closure cost estimates (and for disposal facilities, post-closure cost estimates)? (YES) NO NA

265.76 5. Has the facility received any waste, which does not fall under the small generator exclusion, not accompanied by a manifest or shipping paper? YES (NO)

a. If yes, was an unmanifested waste report submitted to the Regional Administrator? YES NO (NA)

Manifest system, recordkeeping, and reporting requirements:

[X] Adequate [ ] Inadequate

K. Closure and Post-Closure

265.112 1. Does the owner/operator have a written closure plan for the facility? (YES) NO

a. If yes, does the plan include:

1. A description of how and when the facility will be closed? (YES) NO

2. A description of the steps necessary to completely close the facility? (YES) NO

3. An estimate of the maximum inventory of wastes in storage or in treatment at any given time during the facility life? (YES) NO

4. A description of the steps needed to decontaminate facility equipment at the time of closure? (YES) NO

5. An estimate of the expected year of closure and a schedule for final closure which includes the total time required to close the facility and the time required for intervening closure activities which allow tracking closure progress? (YES) NO

265.118 2. If the facility is a disposal facility, does the owner/operator have a written post-closure plan? YES NO (NA)

a. If yes, does the plan include:

1. Ground-water monitoring activities and frequencies at which they will be performed? YES NO (N

2. Maintenance activities and frequencies at which they will be performed to ensure the integrity of the cap and containment structures where applicable, and the function of the monitoring equipment? YES NO (N

3. The name, address, and phone number of the person or office to contact during the post-closure period? YES NO (N

Closure and post-closure requirements:

[X] Adequate [ ] Inadequate

L. Financial Requirements

265.142 1. Does the owner/operator have a written estimate of the closure cost? (YES) NO

265.143 2. Has the owner/operator established financial assurance for facility closure and notified the Regional Administrator? (Required after 7-6-82). (YES) NO

265.144 3. If the facility is a disposal facility, does the owner/operator have a written estimate of the annual cost of post-closure monitoring and maintenance of the facility? YES NO

265.145 4. Has the owner/operator of the disposal facility established financial assurance for post-closure care and notified the Regional Administrator? (Required after 7-6-82) YES NO (NA)

265.147 5. Has the owner/operator obtained liability insurance for sudden occurrences of at least $1 million with an aggregate of at least $2 million exclusive of legal defense costs? (Effective 7-15-82). (YES) NO

6. If the facility is a disposal facility, has the owner/operator obtained liability insurance for nonsudden and accidental occurrences of at least $3 million per occurrence with an annual aggregate of at least $6 million exclusive of legal defense costs? (Effective 7-15-82) YES NO (N

Financial requirements:

[X] Adequate [ ] Inadequate

M. Management of Containers

265.170 1. Are containers presently used to store hazardous waste? (YES) NO

a. If no, do not complete questions 2-5.

b. If yes, check condition of containers and for evidence of incompatibility of waste with containers.

Condition of Containers:

[ ] Adequate [X] Inadequate [ ] Not Applicable

265.173 2. Are all containers holding hazardous waste closed during storage except when necessary to add or remove waste? (YES) NO

265.174 3. Does owner/operator inspect areas where containers are stored, at least weekly, for signs of leakage and/or deterioration caused by corrosion or other factors? (YES) NO

265.176	4.	Are containers holding ignitible or reactive waste located at least 15 meters (50 feet) from the facility's property line?	(YES) NO N
265.177	5.	If waste in containers is incompatible with other materials stored nearby, in other containers, piles, open tanks, or surface impoundments, are the containers separated from the other materials by means of a dike, berm, wall, or other device?	(YES) NO

Management of Containers:

[X] Adequate [ ] Inadequate [ ] Not Applicable

Note: Determine if owner/operator claims any information confidential.

Note: Fill out applicable checklists for specific facility types (i.e. tanks, surface impoundments, piles, land treatment, landfills, groundwater monitoring).

Additional Information and CONCLUSIONS

Form: TSD 4/82

Kansas Department of Health and Environment
Bureau of Waste Management
Forbes Field, Topeka, Kansas 66620
(913) 296-1600

Tank Inspection Checklist

Owner Information

Date 9-10-91 EPA I.D. No. KSD007246846

Facility Name Hydrocarbon Recyclers, Inc.

Street 2549 N. New York

City Wichita, Kansas Zip 67219

Tank Information

	Tank #1	Tank #2	Tank #3
Description:	SEE ATTACHED SHEET.		
Capacity:			
Substance Stored:			
Waste Code:			
Location:			

Existing Tank System(s)

I. Is the tank(s) labeled with the words "Hazardous Waste"? (K.A.R. 28-31-4) (Yes) No

II. If the tank(s) is not covered, does it have at least 2 feet (60 cm) of freeboard unless equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would provide? (40 CFR 265.192(c)) Yes No (NA)

III. Is the tank(s) equipped with a waste-feed cutoff or bypass system(s) as required by 40 CFR 265.192(b and d)? (Yes) No

IV. Are daily inspections made of all systems pertinent to the proper operation of the tank? (Yes) No

A Discharge and cutoff systems? (Yes) No NA

B. Tank level and freeboard? Yes No (NA)

C. Drainage systems? Yes No (NA)

D. Above-ground portions for corrosion? (Yes) No NA

E. Monitoring and leak detection equipment? (Yes) No NA

F. Secondary containment? (Yes) No NA

V. Are these inspections documented in a log? (Yes) No

A. In the case of a permitted T/S/D facility, do they follow the inspection schedule outlined in their permit? (Yes) No NA

VI. Has the tank(s) been used to treat or store wastes substantially different from previous wastes or have substantially different treatment processes been used in the tank(s)? Yes (No)

A. If yes, were waste analyses and trial treatment or storage tests conducted prior to implementing the proposed changes and is all the data kept on file in the facility operating record or was written, documented information on similar storage or treatment process changes obtained prior to implementing the proposed changes and is all documentation kept on file in the facility operating record? Yes No (NA)

VII. With the exception of emergency situations, have ignitable or reactive wastes been placed in the tank(s) by the facility? (Yes) No NA

A. If yes, has the facility insured the safety of the operation by one or both of the following methods (40 CFR 265.98)?

1. Was the waste treated immediately before or after being placed in the tank(s) so that it is no longer ignitable or reactive and such treatment is done in compliance with the safety requirements of 40 CFR 265.15(b)? Yes (No) NA

2. Was the waste stored or treated under protected conditions eliminating the possibility of ignition or reaction? (Yes) No NA

VIII. If a covered tank(s) is used to treat or store ignitable or reactive wastes, does the facility meet the NFPA buffer zone requirements? (40 CFR 265.198(b)) (Yes) No NA

IX. If incompatible waste materials are placed in the same tank(s) or are put in a contaminated tank(s), is this done under completely controlled and safe conditions as specified in 40 CFR 265.199? Yes No (NA)

X. If the tank(s) has cathodic protection systems, is it inspected according to the following schedule (40 CFR 265.195(b))? Yes No (NA)

A. Was proper operation confirmed within 6 months of installation and annually thereafter? Yes No (NA)

B. Are induced current sources inspected/tested at least bimonthly? Yes No (NA)

C. Are records maintained of these inspections? Yes No (NA)

XI. Was the tank(s) used for the management of hazardous waste prior to July 14, 1986? (Yes) No NA

A. If yes, does the tank system(s) have secondary containment? (Yes) No NA

B. If no, has a written assessment that attests to the integrity of the tank(s) been prepared by an independent registered engineer? (Yes) No NA

If yes, did the assessment include the following:

1. Design standards according to which the tank and ancillary equipment were constructed? (Yes) No

2. Existing corrosion protection measures? Yes No (NA)

3. Hazardous characteristics of the waste to be handled? (Yes) No

4. Documented age of the tank system (if available) or estimate of the age? (Yes) No

5. Results of a leak test, internal inspection, or other tank integrity examination? (If the results of this test show the tank to be leaking or unfit for use, the owner must implement 40 CFR 265.196.) (Yes) No

6. Is the leak test conducted annually by an independent, qualified, registered engineer? (40 CFR 265.193(i)(1) and (2)) (Yes) No

7. Are records of the assessment results maintained on file at the facility? (Yes) No

Schedule date when secondary containment is required per schedule in 40 CFR 265.193(a) (1 through 5). _____

Existing Tank System(s)	☒ Adequate	☐ Inadequate

New Tank System(s)

XII. Is the tank system(s) required to have secondary containment (new system or according to schedule in 40 CFR 265.193(a)(1 through 5)? (Yes) No

A. If yes, has the owner or operator requested a variance from the secondary containment? (40 CFR 265.193(g and h) Yes (No) NA

B. If yes, does the secondary containment meet the following minimum requirements? (40 CFR 265.193(b and c)

1. Constructed of or lined with materials compatible with the waste and of sufficient strength? (Yes) No NA

2. Placed on a structurally adequate foundation? (Yes) No NA

3. Provided with a leak detection system capable of detecting releases within 24 hours? (Yes) No NA

4. Adequately sloped or designed and operated to drain and remove liquids from leaks, spills or precipitation? (Yes) No NA

C. If yes, does the secondary containment include one of the following: (40 CFR 265-193(d))

1. External liner? Yes (No) NA

2. Vault? (Yes) No NA

3. Double-walled tank? Yes (No) NA

4. Equivalent device approved by the Secretary? Yes No (NA)

D. If yes, does the secondary containment satisfy the following requirements: (40 CFR 265.193(e))

For External Lines and Vaults

1. Adequate capacity to contain 100% of the largest tank within its boundary? (Yes) No NA
2. Designed or operated to prevent infiltration of precipitation into the containment system unless it has adequate capacity to contain a 25 year, 24 hour rain event? (Yes) No NA
3. Free of cracks or gaps? (Yes) No NA
4. Completely surrounds the tank and surrounding earth likely to be exposed to waste if a release occurs? (Yes) No NA

For Vaults

1. Constructed with chemical-resistant water stops at all joints? (Yes) No NA
2. Provided with an impermeable coating or lining over the concrete? (Yes) No NA
3. Protected against vapor ignition, if required due to the waste characteristics? Yes No (NA)
4. Provided with an exterior moisture barrier? Yes No (NA)

For Double-Walled Tanks

1. Designed as an integral structure for containment of releases? Yes No (NA)
2. If metal, is it protected from corrosion, if metal? Yes No (NA)
3. Provided with a built-in continous leak detection system capable of detecting releases within 24 hours? Yes No (NA)

XIII. Is ancillary equipment provided with adequate secondary containment? (40 CFR 265-193(f)) (Yes) No NA

XIV. Has the tank system or secondary containment system had a leak or spill or was it determined to be unfit for use? Yes (No) NA

A. If yes, was it immediately removed from service and appropriate follow-up actions taken as required by 40 CFR 265.196 (b through e)? Yes No (NA)

XV. If extensive repair has been conducted on the tank system was it recertified in accordance with 40 CFR 270.11(d) and such certification submitted to the Secretary within 7 days? (40 CFR 265.196(f)) Yes No (NA)

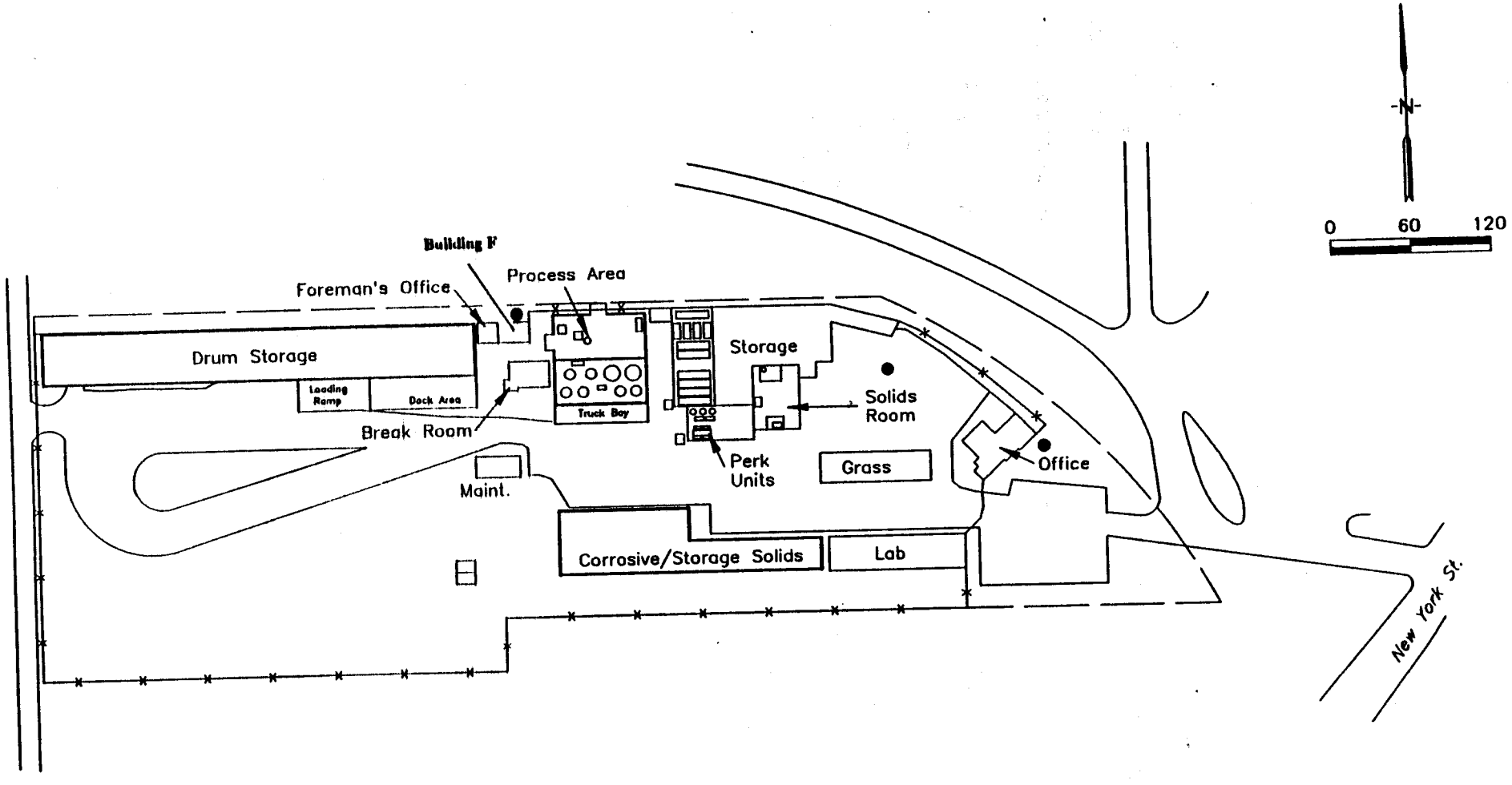
New Tank System Requirements	☒ Adequate	☐ Inadequate

Comments: _____

4.89

Hazardous Waste Tank Storage (S02) Service[1]

VESSEL	CAPACITY - WORK (gal)	CAPACITY - MAX (gal)	LOCATION
V-1	7,181	7,363	Process Area
V-2	7,084	7,084	Process Area
V-3	7,181	7,363	Process Area
V-4	7,181	7,363	Process Area
V-5	20,895	20,895	Process Area
V-6	20,895	20,895	Process Area
V-7	7,181	7,363	Process Area
V-8	7,181	7,363	Process Area
V-9	5,078	5,078	Building D
V-10	5,078	5,078	Building D
V-11	5,078	5,078	Building D
V-12	5,078	5,078	Building D
V-13	5,078	5,078	Building D
V-14	5,078	5,078	Building D
V-15A	2,659	2,659	Building D
V-15B	2,659	2,659	Building D
V-15C	2,659	2,659	Building D
V-15D	2,659	2,659	Building D
V-16	9,028	9,028	Building D
V-17	522	522	Process Area
V-18	489	489	Building D
V-26	1,129	1,155	Process Area
V-29	90	90	Building D
V-30	90	90	Building D
V-31	115	115	Building D
V-32	115	115	Building D
V-34	539	539	Process Area
TOTAL	138,000	138,936	N/A



HYDROCARBON RECYCLERS, INC. dba USPCI

(Wichita, Kansas)

SITE PLAN

Background Sample Locations ●

Attachment 1

Attachment 2

SOP No. FR002A Attachment No. 1

JOINT RCRA OVERVIEW INSPECTION CHECKLIST

Date of Inspection: 7/28/92

Facility Name/Location: Hydrocarbon Recyclers, Inc.
2549 N. New York
Wichita, KS 67219

Facility Phone Number: (316) 268-9490

Facility EPA/State ID Number(s): KSD007246846

Facility Cassification: ☒ Generator ☐ Transporter ☒ TSD acility
☐ Resource Recovery Facility

Participants:	Name	Title
Facility:	Steve Kerbs	Facility Manager
	Ron Robertson	Safety & Env. Mgr.
State:	Teresa Hansen	Environmental Technician
	Sew Kour	Environmental Engineer
EPA:	Kris Goscha	Environmental Scientist

INSPECTION EVALUATION (S = Satisfactory, U = Unsatisfactory)

		Remarks/suggestions for improvement
S	Preparation for Inspection	See Report
U	Inspection Tools	
U	Entry Procedures	
S	Facility Information Verification	
S	Records Check	
S	Site Inspection	
S	Documentation	
S	Outbriefing	
S	Inspection Technique	

Comments:

SECTION A - Preparation for Inspection

	YES	NO	N/A
1. Reviewed following facility information/files	✓		
a. Notification	✓		
b. Part A Applications and/or permit	✓		
c. Previous inspection reports	✓		
d. Letters, correspondence, misc.	✓		
2. Had coordinated with EPA/other state personnel	✓		
3. Was knowledgeable of regulations	✓		
4. Had performed previous RCRA inspections	✓		
5. Was overall familiar with facility	✓		
6. Had inspected this facility previously	✓		
7. Had contacted facility to provide notification of inspection		✓	

Comments:

SECTION B - Inspection Tools

1. Adequate individual safety equipment	✓		
2. Brought camera and film	✓	✓	
3. Brought copy of regulations	✓		
4. Brought copies of appropriate checklists	✓		
5. Brought files on facility	✓		
6. Brought adequate writing material	✓		
7. Field NOV (if applicable)			✓

Comments:
2. She did not have extra film available after she ran out. I provided her with film so she could complete her inspection

SECTION C - Entry Procedures

1. Did inspector attempt to contact designated official/representative?	✓		
2. If designated official/representative was not available, did inspector determine that spokes-person was authorized to speak for facility?			✓
3. Was facility provided prior notification of inspection by inspector?		✓	
4. If entry was denied, did inspector follow established state procedure?			✓
5. Did inspector present his credentials?	✓		
6. Did inspector explain authority for inspection?		✓	
7. Did inspector explain reason for inspection?	✓		
8. Did inspector explain facility's confidentiality rights?	✓		
9. Did inspector explain how the inspection would proceed?	✓		

Comments:

6. Failed to explain authority, Sect. 3007 RCRA, to conduct inspection

SECTION D - Facility Information Verification

	YES	NO	N/A
1. Obtained information on processes/ operations at facility.	✓		
2. Identified and quantified all wastes generated.	✓		
3. Wastes were properly classified.	✓		
4. Method of determining hazardous waste was esabl shed.	✓		
5. Methods of handling and disposal of wastes are determined.	✓		
6. Information contained in notification, Part A application and/or permit was verified	✓		

Comments:

SECTION E - Records Check

1. Did the inspector inspect and evaluate the following records in detail?			
a. Manifests	✓		
b. Inspection records	✓		
c. Operating records	✓	✓	*
d. Waste Analyses	✓		
e. Personnel Training records	✓		
f. Annual reports			
2. Did inspector inspect and evaluate the following plans/programs to determine compliance with requirements?			
a. Preparedness and prevention	✓		
b. Contingency plan		✓	
c. Groundwater Monitoring		✓	
d. Closure/post-closure		✓	
e. Financial assurance/liability		✓	
3. Did inspector utilize appropriate checklists?	✓		
4. Did inspector obtain photocopies?	✓		

Comments:

* 1. Waste Analysis Plan was not evaluated in detail for TCLP & Subpart BB requirements.

SECTION F - Site Inspection

1. Did inspector visually inspect and fully evaluate each area of the facility were hazardous wastes are generated or managed?	✓		
2. Were photographs taken to document deficiencies or violations?	✓		
3. Did inspector obtain or make sketch of facility?	✓		

Comments:

SECTION G - Documentation of Inspection

	YES	NO	N/A
1. Did inspector take adequate notes?	✓		
2. Did inspector obtain photocopies of specific records, reports, etc. to document deficiencies?	✓		
3. Did inspector complete applicable checklists to document results of inspection?	✓		
4. Did inspector take photographs to document observations?	✓		

Comments:

SECTION H - Outbriefing

1. Did inspector explain deficiencies/ violations to responsible official?	✓		
2. Was a Notice of Violation issued?			✓
a. Were all deficient items noted?	✓		
b. Were regulatory cites correct?	✓		
3. Did inspector require facility to take any actions to correct deficiencies?	✓	~~✓~~	
4. Did inspector adequately address any questions from facility?	✓		
5. Were receipts provided for materials received on-site?			✓

Comments:

3. Overpack leaking containers

SECTION I - Inspection Technique

1. Did inspector avoid leading questions?	✓		
2. Did inspector use probing questions to obtain information?	✓		
3. Was inspector thorough in his/her inspection?	✓		
4. Did inspector interpret regulations properly?			
5. Were all regulatory requirements reviewed and evaluated?	✓*		
6. Did inspector effectively determine facility's Compliance status?	✓		

Comments:

Attachment 3

D Building -

Oakite parts cleaner - Product.
3 drums labeled non-haz. waste.

3- Sm. overpacks - storage
Labeled non-haz. waste.

1- Salvage

1 - RQ waste Mercury Metallic ORM-B
3-12-91 Accumulation start date.
5 gallon container

? Waste Insecticide Dry - Bromide Non-reg.

1 - RQ Waste Mercury Metallic (5 gallon)
no date

1 - RQ waste Mercury Metallic -
accum. date 4/92 only
(no day)

U151 Code - No disposal Outlet

2/

1 - 55gal. Haz Waste solid NOS
Accum. date 3-11-91
Shredded 6-12-92

redoing N. side of Bldg D.

using W151 waste code. Sheppard AFB, Wichita Falls, TX.
Apache Corp. Lipscomb County TX

Bethleham Aparatus, Pennsylvania.

Cracking of floor (D100.)

SE end of bldg. - Cut out floor. & Rob R. said they can't get coating to stay

3

Tank storage –

processing area

4 - fuel blend

4 - waste thru

8-3 thru 7-92
Closed to redo the floor. Coating wearing off of areas ~~that~~ where the floor troughs were filled in.

Drum washer rinsates. – #2 Diesel.
emptied 1 x week. –

Drum scraper – cleaned end of every shift

floor dry – used for kiln fuel.

4

Debris from Bldg F - to Lore Mnt.

Building C

Cracks in floor

C701 - 3rd. drum E.
Crystalizing at bottom.
Label & not visable

5th - E
Crystalization / W 4th.
~~No.~~ lable not visable

900-1000 drums

170 dock

C 701 - severly dented
C715 - " "
C725 - "
C727 " / leaking

5

Bldg. B.

55 gal. Welch Plaza Cleaners
severly dented.

floor chipped - needs coating.

6

3-591 Ron's latest training → Conducts all Employee training.

Manifests & LDR

? ★ Questions on waste received from Broker.
When it's remanifested, the manifest # is changed — LDR does not correspond w/ new manifest number. —

C/P James Hamilton no long there. — Replace w/ Joe Dawley.

KG

JP

Manifest #1 92002 5/14/92

To Van Waters & Rogers Omaha NE From Byron Originals Inc. IA ID 182163527

VWR 92037 to HRS

LDR Notice had 92002# & not the required 92037 VWR #. 5/26/92

KG

Bldg. D. (OSHA Reg all prod. to be labeled w/ product name.)

Product drums labeled non-haz. waste. —

will w/ Topeka

Mercury Metallic > 1 yr. storage. Need to submit documentation to Topeka on attempt to find a disposal facility.

Cracking of floor - Date of repair * Comment - as long as they remain interm. states.)

Tank area to be closed Aug. 3 through 7 to be re-sealed where needed.
trough area

KG

Bldg. C

Cont in poor condit

C701 - 2 drums w/ crystalization on bottom

C707 C715 C725? C727? - Severely dented.

KG

Leaking container

C727 - 1 leaking or spillage (?)

Bldg. B floor cracked

severely dented drum. - perc. wastes

→ Ron's training > 1 yr. ago
3-5-91 latest date.

C/P changes. on Emergency Coordinator. — When drill. the changes be submitted. w/ Part B. →

Questions on Broker Shipments.

will w/ Joe

more specific cross reference from new manifest and old manifest & LDR.

Attachment 4

General

POLLUTION PREVENTION WORKSHEET

1. Do the manifests used by the facility certify that a pollution prevention program is in place (specific wording listed under 40 CFR 262 Appendix): Yes ✓ No ___ Further Explanation: _____

2. Does the facility biennial report contain a description of pollution prevention efforts and achievements (specific requirements listed under 40 CFR 262.41 a.6 & a.7, 264.75 h & i, and 265.75 h & i): Yes ___ No ___ Further Explanation: _____

3. If facility is a permitted TSD, does the operating record contain an annual certification that a pollution prevention program is in place (specific wording listed under 40 CFR 264.73 b.9): Yes ___ No ___ N/A X Further Explanation: Not Permitted

4. Does the facility have a written pollution prevention program: Yes ___ No X Further Explanation: _____

IF YES, ATTEMPT TO OBTAIN A PHOTOCOPY; COPY ATTACHED: YES ___ NO X

5. If the facilty does not have a written pollution prevention program, does the facility have an unwritten program that can be verbally described: Yes X No ___ N/A ___ Further Explanation: _____

SUMMARY OF VERBAL DESCRIPTION: Shread & grind all waste pallets & plastics for energy recovery. Use burnable absorbants.

NOTE: THERE IS NO REQUIREMENT FOR A POLLUTION PREVENTION PROGRAM TO BE WRITTEN, AND SPECIFIC REGULATORY CRITERIA HAVE NOT BEEN ESTABLISHED FOR POLLUTION PREVENTION PROGRAMS. THE INSPECTOR SHOULD NOT CONDUCT A TECHNICAL REVIEW OF WRITTEN OR VERBAL PLANS.

6. If the facility has a written or verbal pollution prevention program, is this program actually being implemented: Yes ✓ No ___ Further Explanation: _____

7. Is facility complying with any additional pollution prevention requirements established by a permit or enforcement action: Yes ___ No ___ N/A ✓ Further Explanation: _____

8. **ENCOURAGE THE FACILITY TO BEGIN/CONTINUE POLLUTION PREVENTION EFFORTS:** Accomplished ___

9. **PROVIDE THE FACILITY WITH THE FOLLOWING INFORMATION:**

Appropriate Fact Sheet(s): Accomplished ✓
(Multimedia plus industry specific if appropriate)
State Contact Information: Accomplished ✓
Clearinghouse Information: Accomplished ✓

State of Kansas
Joan Finney, *Governor*

Department of Health and Environment
Azzie Young, Ph.D., *Secretary*

September 15, 1992

Reply to: **South Central District Office**
1919 N. Amidon, Suite 130
Wichita, Kansas 67203
Phone: (316) 838-1071
Fax: (316) 838-0042

Steve Keiter
Hydrocarbon Recyclers, Inc.
2549 N. New York
Wichita, Kansas 67219

Re: Hazardous Waste Compliance Inspection
EPA Identification Number: KSD007246846

Dear Mr. Keiter:

On July 28, 1992 your facility was inspected to determine compliance with state hazardous waste regulations.

The inspection revealed that your facility generates the following hazardous wastes as defined by K.A.R. 28-31-3:

	Wastes Generated	Waste Codes
1.	Chlorinated solvents	F001/F002
2.	Tetrachloroethylene contaminated wastes (carbon, cartridge filters, water)	F002
3.	Flammable waste water	D001/D007/D008
4.	Solvents and solvent/paint mixtures	D001/F003/F005
5.	Oxidizers (Class 1 and 2 only)	D001
6.	Nonblendable wastes	D004/D005/D006/ D007/D008/D009/ D010/D011
7.	Blendable wastes for kiln fuel	D001/F001/F002/ F003/F005/U-listed/ D004 to D011
8.	Corrosives	D002/D007
9.	Contaminated floor sweepings, protective clothing and sampling equipment	D002/D007/D001/F001/ F006

The quantity of hazardous waste generated is more than 1000 kilograms (approximately 2200 pounds) per month. Therefore, your facility is considered an EPA generator and is regulated under K.A.R. 28-31-4 excluding 28-31-4(h) and (m). Your facility is also an interim status storage, treatment or disposal (T/S/D) facility and is subject to K.A.R. 28-31-8. In addition your facility is the marketer of hazardous waste fuels and is subject to 40CFR Part 266 as adopted by K.A.R. 28-31-8(b).

The inspection identified the following items not in compliance with state regulations concerning generators of hazardous waste:

1. You have not submitted the changes in your emergency coordinators as required by K.A.R. 28-31-4(g).

2. You did not have documentation of training within the past year for Ron Robertson as required by K.A.R. 28-31-4(g). However, Mr. Robertson's responsibilities include conducting the annual training. It is recommended that Mr. Robertson document his attendance of these training sessions.

3. The following 55-gallon drums were not in good condition as required by K.A.R. 28-31-4(g).

   Bldg. B. - 1 severely dented drum
   Bldg. C. - 3 severely dented drums located in aisles C707, C715, C727
   1 leaking drum located in aisle C727
   2 drums with that had crystallized on the bottom rim located in aisle C701

These violations must be corrected by October 9, 1992. Notify me in writing addressing each violation and the action you have taken to correct each one.

Your facility is storing mercury wastes (U151), a restricted hazardous waste, for greater than one year. The land disposal restriction effective date was May 6, 1992. You will need to dispose of this waste before May 6, 1993. If you are unable to find a disposal method for this waste you will be required to demonstrate and document your purposes for storing these waste for greater than one year past the effective date as required by 40 CFR 268.50.

Observations made during the inspection revealed cracks were visible in the secondary containment of the storage areas of Building C and D. These areas are currently under repairs. The repairs will need to be completed before your permit can be approved.

In the storage area, I found that the hazardous waste label on several drums in Building C were not clearly visible. It is recommended that the drums be placed so the hazardous waste label and the accumulation start date can be easily seen.

Also, there were drums located in the maintenance area that were marked with a non-hazardous waste label. The drums contained product (oakite) and others were used for storage. It is recommended that the drums be identified in another manner, not as a waste.

While reviewing manifests for waste that you have received from Van Waters and Rogers, I found that the Land Disposal Restriction (LDR) notice from the original generator was attached. It does not clearly identify the new manifest number. It is recommended that a specific reference be made for these manifests.

Your cooperation with the hazardous waste management program is appreciated. If you have questions concerning the inspection, please call me at (316) 838-1071.

Sincerely,

Teresa Hansen

Teresa Hansen
Inspections and Enforcement Section
Bureau of Waste Management

TH:ss

pc: Mike Tate, BWM, Topeka
John Mitchell, BWM, Topeka
Kris Goschen, EPA, Region VII
SCD-File

Kansas Department of Health and Environment
Bureau of Air and Waste Management
Forbes Field, Topeka, Kansas 66620

Hazardous Waste Generator/Transporter Compliance Inspection Report

General

Time 9:00 AM Date 7-28-92

Facility Name Hydrocarbon Recyclers, Inc. EPA ID No. KSD007246846

Street 2549 N. New York City Wichita, KS Zip 67219

Mailing Address (if different than above) _____

County Sedgwick Phone (316) 268-9490

Contact(s) Steve Keiter, Facility Manager

Ron Robertson, Facility Safety and Compliance Officer

Inspector(s) Teresa Hansen, Siew Kour, Kris Goschen EPA Region VII

Type of Business Commercial T/S/D - Hazardous Waste Fuel Marketer.

Has the company declared any information/processes as trade secrets (KSA 65-3447)? Yes (No)
If yes, explain.

Industrial Wastes Generated

(List hazardous wastes first)

Waste:	Chlorinated Solvents	Tetrachloroethylene contaminated wastes (carbon, filters)
If waste is hazardous, give HW ID Number:	F001/F002	F002
Amount generated per month:		
Amount presently in storage:		
Accumulation time:		
Present disposal method:	HRI, Tulsa, OK and HRI, San Antonio, TX	Rollins, Deerpark, TX and Ross, Grafton OH

Waste:	Flammable Wastewater	Solvent and paint solvent mixture (kiln fuel)
If waste is hazardous, give HW ID Number:	D001/D007/D008	D001/F003/F005
Amount generated per month:		
Amount presently in storage:		
Accumulation time:		
Present disposal method:	Gibralter, TX Incineration Deep Well Injection	Systech, Fredonia, KS

Waste:	Oxidizers	Non-blendable Wastes
If waste is hazardous, give HW ID Number:	D001	D004 - D011
Amount generated per month:		
Amount presently in storage:		
Accumulation time:		
Present disposal method:	Incineration - Rollins or Ensco. W/ Listed codes	USPCI, Lone Mountain, OK. Incineration - Rollins or Ensco.

Waste:	Blendable Wastes for Kiln Fuel	Corrosives
If waste is hazardous, give HW ID Number:	D001/F001/F002/F003/F005 Approved U wastes, D004 - D011 D18-43	D002/D007
Amount generated per month:		
Amount presently in storage:		
Accumulation time:		
Present disposal method:	Systech, Fredonia, KS and Heartland Cement, Independence	USPCI, Lone Mountain, OK.

Waste:	Non-hazardous wastewater	Used Oil
If waste is hazardous, give HW ID Number:	none	none
Amount generated per month:		
Amount presently in storage:		
Accumulation time:		
Present disposal method:	Gibralter for Deep Well or USPCI, Lone Mountain, OK Water treatment plant	Systech, Fredonia, KS.

General Requirements (GGR)

I. Has the facility evaluated all potentially hazardous waste(s) to determine if it is hazardous? (KAR 28-31-4(b)) — (Yes) No

A. If waste(s) was tested, was the analysis conducted by a laboratory certified by KDHE? (KAR 28-31-4(b)(3)(A)) — (Yes) No NA

B. If waste(s) was tested, are the results kept for three years? (KAR 28-31-4(f)(1)(C))? — (Yes) No NA

II. If hazardous waste(s) is disposed of via the sanitary sewer to a Publicly Owned Treatment Works (POTW), has written permission been obtained from the operator of the POTW? (KAR 28-31-3/40 CFR 261.4) — Yes No (NA)

III. If industrial waste(s) is disposed of at a permitted sanitary landfill, has a disposal authorization been obtained? (KAR 28-29-23) — Yes No (NA)

A. If yes, list the authorization number(s): _____

IV. Facility size classification:

☐ Not a Generator ☐ Small Qty. Generator ☐ Kansas Generator ☒ EPA Generator
☒ T/S/D Facility ☒ Transporter ☒ HW [redacted]/Marketer ☐ Used oil Burner/Marketer

Hazardous Waste Determination Requirements: ☐ Adequate ☐ Inadequate

Notification Requirements (GGR)

V. Has generator notified KDHE and obtained an EPA Identification Number? (KAR 28-31-4(c)) — (Yes) No NA

VI. Is current notification accurate? (KAR 28-31-4(c)(1)) — (Yes) No NA

A. Is this facility marketing (selling) hazardous waste as a fuel? — (Yes) No NA

B. Is this facility marketing (selling) used oil as a fuel? — Yes (No) NA

(If yes, to either question A or B, complete Used Oil Fuel Marketers/Blenders Checklist.)

C. Is this facility burning hazardous waste as a fuel? — Yes (No) NA

D. Is this facility burning used oil as a fuel? — Yes (No) NA

Notification Requirements: ☒ Adequate ☐ Inadequate ☐ NA

(If small quantity generator, stop here.)

Manifests (GMR)

VII. Is a contractual agreement used in place of manifesting? (KAR 28-31-4(d)(7)(A-C)/40 CFR 262.20(e)(1-2)) — Yes (No)

A: If yes, does the contractural agreement include the type of waste and frequency of shipments? — Yes No

B. If yes, is the vehicle used to transport the waste owned and operated by the reclaimer of the waste? — Yes No

C. If yes, is a copy of the agreement kept for a period of three years after termination of agreement? — Yes No NA

VIII. Is a current manifest showing revision date and burden disclosure statement used? (KAR 28-31-4(d)/40 CFR 262.20) — (Yes) No NA

A. If yes, does manifest(s) include:

1. Generator EPA Identification Number (12 digit) and manifest document number (five digit)? — (Yes) No NA
2. Number of pages? — (Yes) No
3. Generator's name and mailing address? — (Yes) No
4. Generator's phone number? — (Yes) No
5. Transporter 1 Name? — (Yes) No
6. Transporter 1 EPA Identification Number? — (Yes) No
7. Transporter 2 Name? — (Yes) No NA
8. Transporter 2 EPA Identification Number? — (Yes) No NA
9. Name and site address of designated facility? — (Yes) No
10. Designated facility's EPA Identification Number? — (Yes) No
11. Waste Description (DOT shipping name, hazard class, and Identification Number)? — (Yes) No
12. Number and type of containers? — (Yes) No
13. Total quantity? — (Yes) No
14. Unit (weight or volume)? — (Yes) No
15. Special handling instructions? — (Yes) No NA
16. Generator's certification including waste minimization statement, generator's signature, and date? — (Yes) No
17. Name, signature, and date of transporter 1? — (Yes) No
18. Name, signature, and date of transporter 2? — (Yes) No NA

B. Does generator retain a copy of manifest(s) signed by both generator and transporter? (KAR 28-31-4(d)(4)(A-C)) — (Yes) No

C. Does generator retain copy of manifest(s) signed and dated by T/S/D/ facility owner/operator for three years? (KAR 28-31-4(f)(1)(A)) — (Yes) No

D. Has generator ever failed to receive a signed copy of a manifest within 45 days of initiating a shipment? — Yes (No)

1. If yes, was exception report(s) filed? (KAR 28-31-4(f)(4)(B)) — Yes No (NA)
2. If yes, was copy retained for three years? (KAR 28-31-4(f)(1)(A)) — Yes No (NA)

Manifesting Requirements: ☒ Adequate ☐ Inadequate ☐ NA

Land Disposal Restrictions Requirements (GLB)

IX. Does facility generate any wastes subject to the land disposal restrictions requirements of 40 CFR 268, Subparts B and C? (Yes) No
List these wastes:

A. All Wastes
D. _____
B. _____
E. _____
C. _____
F. _____

X. Is the waste(s) covered by a National Variance(s), Extension, or Petition? (40 CFR 268 5&6) Yes (No)
A. If yes, describe the variance, extension, or petition which applies:

_____

_____

XI. Is the waste covered by an exemption? (40 CFR 268.1(c)(2)) Yes (No)
A. If yes, does the generator provide a notice with the waste to the T/S/D facility stating that the waste is exempt from the land disposal restrictions? (40 CFR 268.7(a)(3)) Yes No (NA)

XII. Does generator ship waste(s) covered by the Land Disposal Restrictions off-site for treatment or disposal? (Yes) No
A. If yes, does the generator provide a notification to the T/S/D facility that includes: EPA hazardous waste number(s), applicable treatment standards, manifest number(s), and waste analysis data, if available? (40 CFR 268.7) (Yes) No
B. If yes, is a copy of this notification kept for five years? (Yes) No

XIII. Does generator treat restricted waste(s) on-site so that they are below the land disposal restrictions standards? (If yes, fill out land disposal restrictions checklist.) Yes (No)

Land Disposal Restrictions Requirements:	☒ Adequate	☐ Inadequate	☐ NA

Pre-Transport Requirements (GPT)

XIV. Does generator package waste in accordance with DOT requirements? (KAR 28-31-4(e)(1)) (Yes) No NA

XV. Does generator label (flammable liquid, poison, etc.) each package in accordance with DOT requirements of 49 CFR 172.101 or 172.102? (KAR 28-31-4(e)(2)) (Yes) No NA

XVI. Does generator mark (consignee's or consignor's name and address, etc.) on each package in accordance with DOT requirements of 40 CFR 172 Subpart D? (KAR 28-31-4(e)(3)) (Yes) No NA
A. Does generator mark each container of 110 gallons or less as below? (KAR 28-31-4(e)(3)) (Yes) No NA

> **Hazardous Waste – Federal Law Prohibits Improper Disposal.**
> **If found, contact the nearest police or public safety authority or the US EPA.**
>
> **Generator's Name and Address**
>
> **Manifest Document Number**

XVII. Does generator have placards to offer to transporters in accordance with 49 CFR 172 Subpart F? (KAR 28-31-4(e)(4)) (Yes) No NA

XVIII. Does generator only use a transporter who is properly registered with the department? (KAR 28-31-4(c)(2)) (Yes) No NA

Pre-Transport Requirements:	☒ Adequate	☐ Inadequate	☐ NA

Biennial Reports (GRR)

XIX. Has generator submitted a biennial report(s) to KDHE? (KAR 28-31-4(f)(2)) (Yes) No NA

A. If yes, does generator retain copies for three years? (KAR 28-31-4(f)(1)(B)) (Yes) No NA

(Note: compare quantities reported on last biennial report with the total quantity of all manifests for those years.)

Biennial Report Requirements:	☒ Adequate	☐ Inadequate

Special Conditions (GSC)

XX. Has generator received or transported any hazardous waste to or from a foreign source? (40 CFR Subpart E & F) (Yes) No

A. If yes, has generator filed a notice with the Secretary of Health and Environment? (Yes) No NA

B. Is waste manifested and signed by a foreign consignee? (Yes) No NA

C. If generator transports waste out of the country, has confirmation of delivered shipment been received? Yes No (NA)

Special Conditions Requirements:	☐ Adequate	☐ Inadequate	☐ NA

Storage Requirements (GPT)

XXI. Does generator temporarily store waste before transport? (Yes) No

A. For 90 days or less? (Yes) No NA

B. For more than 90 days? (Yes) No NA

C. If waste is stored in containers:

1. Are containers marked with the words: "Hazardous Waste"? (KAR 28-31-4(g)(3) or (h)(1)(D)) (Yes) No NA
2. Is the accumulation start date marked on each container? (KAR 28-31-4(g)(2) or (h)(1)(C)) (Yes) No NA
3. Are all containers holding hazardous waste closed during storage except when necessary to add or remove waste? (KAR 28-31-4(g)(1) or (h)(1)(B)) (Yes) No NA
4. Does generator conduct weekly inspections of containers for signs of leakage and/or deterioration caused by corrosion or other factors? (KAR 28-31-4(k)) (Yes) No NA

a. If yes, are these inspections documented in a log that includes date and time of inspection, full name of inspector, notations of observations, and date and nature of remedial actions? (KAR 28-31-4(k)/40 CFR 265.15(d)) (Yes) No NA

5. Are containers holding ignitible or reactive waste(s) located at least 15 meters (50 feet) from the facility's property line? (EPA Generator and T/S/D Only) (KAR 28-31-4(g)(1) / 40 CFR 265.176) — (Yes) No NA

6. If waste in containers is incompatible with other materials stored nearby, are the containers separated from the other materials by means of a dike, berm, wall, or other means? (KAR 28-31-4(g)(1) or (h)(1)(B) / 40 CFR 265.177) — (Yes) No NA

7. Does generator have any satellite storage areas? (KAR 28-31-4(j)) — (Yes) No NA

If yes,

a. Is the waste stored in a container at or near the point of generation and under the control of the operator of the process generating the waste? — (Yes) No
b. Is the container in good condition and closed except to add or remove waste? — (Yes) No
c. Is the container marked with the words: "Hazardous Waste"? — (Yes) No
d. Is the container marked with the accumulation start date at the time it becomes full? — (Yes) No
e. Is the full container moved to the storage area within three days after it became full? — (Yes) No

(If waste(s) is placed in tanks, piles, or surface impoundments, complete the appropriate inspection checklist.)

Storage Requirements: ☒ Adequate ☐ Inadequate ☐ NA

Kansas Generator's Emergency Preparedness (GSQ)

XXII. Has facility named one employee as emergency coordinator? (KAR 28-31-4(h)(1)(E)) — Yes No

A. Is the emergency coordinator available to respond to an emergency by reaching the facility within a short period of time? — Yes No

B. Is the emergency coordinator or his/her designee prepared to respond to any emergencies (fires, spills, or releases) that arise? — Yes No

C. Is the emergency coodinator familiar with the reporting requirements of KAR 28-31-4(h)(2)? — Yes No

XXIII. Is the following information posted next to at least one telephone which is immediately assessable in an emergency? (KAR 28-31-4(h)(1)(F))

A. Name and telephone of emergency coordinator? — Yes No
B. Location of fire extinguishers, fire alarms, or spill control material, if available? — Yes No
C. Telephone number of fire department unless the facility has a direct alarm? — Yes No NA

XXIV. Have employees been trained so that they are familiar with proper waste handling and emergency procedures that are relevant to their responsiblities during normal facility operations? (KAR 28-31-4(h)(1)(G)) — Yes No

A. Is this training documented in any way? — Yes No

Kansas Generator's Emergency Preparedness Requirements : ☐ Adequate ☐ Inadequate ☐ NA

(If Kansas generator, stop here.)

Preparedness and Prevention (GPT)

XXV. If appropriate, based upon the nature and quantity of waste(s) generated and stored at the facility, is the facility equipped with:

A. Internal communication or alarm system easily accessable in case of emergency? (KAR 28-31-4(g)(4)/40 CFR 265.32(a)) Yes No NA

B. Telephone or hand-held two-way radio capable of summoning emergency response personnel? (KAR 28-31-4(g)(4)/40 CFR 265.32(b)) Yes No NA

C. Portable fire extinguisher, fire control equipment, spill control equipment, and decontamination equipment? (KAR 28-31-4(g)(4)/40 CFR 265.32(c)) Yes No NA

D. Is water of adequate volume provided for hose streams, foam producing equipment, sprinklers, etc.? (KAR 28-31-4(g)(4)/40 CFR 265.32(d)) Yes No NA

E. Is this equipment (A-C above) tested and maintained to ensure its proper operation? (KAR 28-31-4(g)(4)/40 CFR 265.33) Yes No NA

XXVI. Does a check of the facility show sufficient aisle space to allow unobstructed movement of personnel and equipment? (KAR 28-31-4(g)(4)/40 CFR 265.35) Yes No NA

XXVII. If appropriate for the type(s) of waste handled, has the owner/operator made the following arrangements:

A. Familiarized the local emergency authorities with the facility, waste(s) handled, entrances and exits? (KAR 28-31-4(g)(4)/40 CFR 265.37(a)(1)) Yes No NA

B. Designated one authority where one or more police or fire departments might respond to an emergency? (KAR 28-31-4(g)(4)/40 CFR 265.37(a)(2)) Yes No NA

C. Made agreements with local emergency response teams, emergency response contractors, and equipment suppliers? (KAR 28-31-4(g)(4)/40 CFR 265.37(a)(3)) Yes No NA

D. Familiarized local hospitals with the properties of hazardous waste(s) handled and types of injuries which could result from fires, explosions, or releases at the facility? (KAR 28-31-4(g)(4)/40 CFR 265.37(a)(4)) Yes No NA

XXVIII. In cases where local authorities decline to enter into such arrangements, is the refusal entered in the operating record? (KAR 28-31-4(g)(4)/40 CFR 265.37(b)) Yes No NA

Preparedness and Prevention Requirements: ☐ Adequate ☐ Inadequate ☐ NA

Personnel Training (GPT)

XXIX. Has the owner/operator established a hazardous waste management training program? (KAR 28-31-4(g)(4)/40 CFR 265.16) Yes No

A. Is the program directed by a person trained in hazardous waste management? (40 CFR 265.16(a)(2)) Yes No

B. Are new personnel trained within six months after their employment? (40 CFR 265.16(b)) Yes No

C. Are new employees supervised until training is completed? (40 CFR 265.16(b)) Yes No

D. After initial training, are employees trained on an annual basis? (40 CFR 265.16(c)) Yes No

E. Does the facility maintain the following documents and records:

1. Job title and job description for each position related to hazardous waste management? (40 CFR 265.16(d)(1)&(2)) Yes No
2. Description of type and amount of training to be given each person? (40 CFR 265.16(d)(3)) Yes No
3. Records of training given to facility personnel? (40 CFR 265.16(d)(4)) Yes No

Personnel Training Requirements: ☐ Adequate ☐ Inadequate

Contingency Plan (GPT)

XXX. Does the facility have a contingency plan? (KAR 28-31-4(g)(4)/40 CFR 265 Subpart D)	Yes	No
If yes,		
A. Does the plan list the name(s), home address, and phone number of designated emergency coordinator(s) in the order in which they should be contacted? (40 CFR 265.52(d))	Yes	No
B. Is an emergency coordinator available at all times? (40 CFR 265.55)	Yes	No
C. Does the plan describe emergency actions facility personnel must take to respond to fires, explosions, or releases of hazardous waste?(40 CFR 265.52(a))	Yes	No
D. Does the plan describe arrangements made with emergency response agencies? (40 CFR 265.52(c))	Yes	No
E. Does the plan include a list of all emergency equipment at the facility, its location, a physical description of each item on the list, and a brief outline of its capabilities? (40 CFR 265.52(e))	Yes	No
F. Does the plan include an evacuation plan for facility personnel that describes signals and evacuation routes? (40 CFR 265.52(f))	Yes	No
G. Have copies of the plan been provided to outside emergency response agencies and hospitals? (40 CFR 265.53)	Yes	No

Contingency Plan Requirements: ☐ Adequate ☐ Inadequate

(If EPA generator, stop here.)

Transporter Requirements (TRR)

XXXI. Does this facility transport hazardous waste? (Yes) No

If yes,

A. Are they registered as a hazardous waste transporter in the state of Kansas? (KAR 28-31-6 (b)) (Yes) No

B. Does transporter comply with the manifest requirements of 40 CFR Part 263.20 except 263.20(h)? (Yes) No

C. Does transporter retain a copy of the manifest for three years? (40 CFR 263.22(a)) (Yes) No

D. Does this facility transport hazardous waste subject to the manifest exemption of KAR 28-31-4(d)(7)? Yes (No)

If yes,

1. Does the transporter record the name, address, and EPA ID Number of the generator; quantity of waste shipped; DOT shipping information; and the date the waste was accepted in a log or shipping paper? Yes No (NA)
2. Does the transporter carry this record when transporting the waste to the reclamation facility? Yes No (NA)
3. Does the transporter retain these records for a period of three years after the termination or expiration of the agreement? Yes No (N/A)

Transporter Requirements: ☒ Adequate ☐ Inadequate ☐ NA

Additional Information and Conclusions:

State of Kansas
Joan Finney, *Governor*

Department of Health and Environment
Azzie Young, Ph.D., *Secretary*

Reply to: (913) 296-1600

September 25, 1991

RECEIVED
OCT 03 1991

Steve Keiter
Hydrocarbon Recyclers, Inc. of Wichita
2549 N New York
Wichita, KS 67219

Re: EPA I.D. Number KSD007246846

Dear Mr. Keiter:

This letter is to acknowledge the subsequent Notification of Hazardous Waste Activity Form your firm submitted on September 18, 1991.

We have updated our records to reflect the change made in contact person and waste codes with the addition of D003, F007, F008, F009, F010, F011, F012, F032, F034, F035, F037, F038, F039, K001, U001, U005, U006, U007, U008, U009, U010, U011, U014, U015, U016, U017, U018, U020, U021, U022, U023, U024, U025, U026, U027, U028, U030, U032, U033, U034, U035, U036, U038, U039, U041, U042, U047, U048, U049, U050, U051, U053, U055, U056, U058, U059, U060, U061, U062, U063, U064, U069, U073, U074, U081, U082, U085, U086, U087, U088, U089, U090, U091, U092, U093, U094, U095, U096, U097, U098, U099, U101, U102, U103, U105, U106, U107, U109, U110, U111, U113, U114, U115, U116, U118, U119, U120, U122, U123, U124, U126, U129, U132, U133, U135, U136, U137, U139, U141, U142, U143, U144, U145, U146, U147, U148, U149, U150, U152, U153, U155, U156, U157, U158, U160, U162, U163, U164, U166, U167, U168, U170, U172, U173, U174, U176, U177, U178, U179, U180, U181, U182, U183, U185, U186, U187, U188, U189, U190, U191, U192, U193, U194, U197, U200, U201, U202, U203, U204, U205, U206, U212, U214, U215, U216, U217, U218, U219, U221, U222, U223, U234, U235, U236, U237, U238, U240, U244, U246, U247, U248, U249, U328, U353, P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, P033, P034, P036, P037, P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048, P049, P050, P051, P054, P056, P057, P058, P059, P060, P062, P063, P064, P065, P066, P067, P068, P069, P070, P071, P072, P073, P074, P975, P076, P077, P078, P081, P082, P084, P085, P087, P088, P089, P092, P093, P094, P095, P096, P097, P098, P099, P101, P102, P103, P104, P105, P106, P107, P108, P109, P110, P111, P112, P113, P114, P115, P116, P118, P119, P120, P121, P122 and P123.

This change in status is effective immediately. A subsequent notification shall be submitted to this office whenever the information originally submitted to obtain an EPA I.D. Number has changed. If I can be of further assistance, please contact me at (913) 296-6898.

Sincerely,

Gigi Perry
Administrative Officer
Hazardous Waste Section
Bureau of Air and Waste Management

C SCDO - BAWM

MIKE HAYDEN
Governor
JACK D. WALKER, M.D.
Secretary

STATE OF KANSAS

Forbes Field
Topeka, KS 66620-000
(913) 862-9360

DEPARTMENT OF HEALTH AND ENVIRONMENT

RCRA Compliance Inspection Report

T/S/D Facilities Checklist

A. General

Date 7-28-92 Time 9:00 AM EPA ID No. KSD007246846

Facility Name Hydrocarbon Recyclers, Inc.

Street 2549 N. New York

City Wichita, Kansas Zip 67219

County Sedgwick Phone (316) 268-9490

Contact Steve Keiter, Facility Manager Ron Robertson, Facility Safety and Compliance Officer

Inspector Teresa Hansen, Siew Kour, Kris Goschen, EPA Region VII

Other

B. Activity at Site

Treatment	Storage	Disposal
___Chem/Phys/Bio Treatment	X Drums	___Incineration
___Filtration	___Pile	___Landfill
___Incineration	___Surface Impoundment	___Land Treatment
___Recycling/Recovery	X Tank, Above ground	___Surface Impoundment
___Reprocessing	___Tank, Below ground	___Other ( )
___Solvent Recovery	___Other ( )	
___Thermal Treatment		
___Volume Reduction		
___Waste Oil		
___Other ( )		

Comments: _____

_____

_____

_____

C. Waste Analysis Plan

265.13

1. Does facility maintain a copy of its waste analysis plan at the facility? YES NO

A. If yes, does the plan include:

1. Parameters for which each hazardous waste will be analyzed and rationale for the selection of these parameters. YES NO

2. Test methods which are used to test for these parameters. YES NO

3. Sampling method used to obtain sample. YES NO

4. Frequency with which the initial analysis will be reviewed or repeated to ensure the analysis is current. YES NO

5. For off-site facilities, the waste analyses that generators have agreed to supply. YES NO NA

6. For off-site facilities, the procedures which are used to inspect and analyze each movement of hazardous waste received to ensure that it matches the identity of the waste designated on the manifest. YES NO NA

Waste analysis plan requirements:

[ ] Adequate [ ] Inadequate

D. Security

265.14

1. Does the facility provide either of the following:

a. A 24-hour surveillance system? (T.V. monitoring or guards). YES (NO)

b. An artificial or natural barrier (fence, fence and cliff combination) and a means to control entry (attendant, T.V. monitoring, locked entrance, controlled roadway access). (YES) NO

2. Does the facility provide warning signs at entrances. (YES) NO

3. Does the facility consider itself exempt from security requirements? YES (NO)

Security requirements:

[X] Adequate [ ] Inadequate [ ] Not Applicable

E. General Inspection Requirements

265.15

1. Does the owner/operator maintain a written schedule at the facility for inspecting:

   a. Monitoring equipment (YES) NO

   b. Safety and emergency equipment (YES) NO

   c. Security devices (YES) NO

   d. Operating and structural equipment (YES) NO

2. Does the inspection schedule identify the types of problems which are to be looked for during the inspections? (YES) NO

3. Does the owner/operator maintain an inspection log? (YES) NO

   a. If yes, does the log contain the:

      1. Date and time of inspection (YES) NO

      2. Name of inspector (YES) NO

      3. Notation of observations (YES) NO

      4. Date and nature of repairs or remedial action (YES) NO

Inspection requirements:

[X] Adequate [ ] Inadequate

F. Personnel Training

265.16

1. Does the owner/operator maintain at the facility, the following documents and records:

a. Job title and job description for each position related to hazardous waste management. (YES) NO

b. Description of type and amount of training to be given each person. (YES) NO

c. Records of training given to facility personnel. (YES) NO

Personnel training requirements:

[ ] Adequate [ ] Inadequate

G. Requirements For Ignitable, Reactive, or Incompatible Wastes

265.17

1. Does the facility handle ignitable or reactive wastes? (YES) NO

a. If yes, is the waste separated and confined from sources of ignition or reaction, sparks, spontaneous ignition, and radiant heat? (YES) NO NA

2. Are smoking and open flames confined to specially designated locations? (YES) NO NA

3. Are "No Smoking" signs posted in hazard areas? (YES) NO NA

4. Does a check of these areas show any leakage or corrosion of containers? (YES) NO NA

5. Does a check of these areas show evidence of heat generation from interaction of incompatible wastes? YES (NO) NA

Ignitable, reactive, or incompatible waste requirements:

[X] Adequate [ ] Inadequate [ ] Not Applicable

H. Preparedness and Prevention

265.31

1. Does an inspection of the facility show any evidence of fire, explosion, or contamination? YES (NO)

265.32

2. If applicable to the facility, is the facility equipped with:

a. Internal communication or alarm system easily accessible in case of emergency? (YES) NO NA

b. Telephone, hand-held two-way radio capable of summoning emergency response personnel? (YES) NO NA

	3.	Are portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment provided?	(YES) NO NA
	4.	Is water of adequate volume provided for hose streams, foam producing equipment, sprinklers, etc.?	(YES) NO NA
265.33	5.	Is this equipment (1-4 above) tested and maintained to assure its proper operation?	(YES) NO NA
265.35	6.	Does a check of the facility show sufficient aisle space to allow unobstructed movement of personnel and equipment?	(YES) NO NA
265.37	7.	If appropriate for the type(s) of waste handled has the owner/operator made arrangements with the local emergency authorities to familiarize them with the layout of facility, properties of wastes handled and associated hazards, places where facility personnel normally work, entrances to roads inside facility, and possible evacuation routes?	(YES) NO NA
	8.	In areas where more than one police and fire department might respond, is there one designated authority?	YES NO (NA)
	9.	If appropriate for the type(s) of waste handled does the owner/operator have agreements with State emergency response teams, emergency response contractors, and equipment suppliers?	YES NO (NA)
	10.	If appropriate for the type(s) of waste handled has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste(s) handled and types of injuries which could result from fires, explosions, or releases at the facility?	(YES) NO NA
	11.	In cases where state or local authorities decline to enter into such arrangements, is the refusal entered in the operating record?	YES NO (NA)

Preparedness and prevention requirements:

[X] Adequate [ ] Inadequate

I. Contingency Plan and Emergency Procedures

262.53	1.	Is a contingency plan maintained at the facility and have copies been provided to outside agencies which may be called upon to provide emergency services?	(YES) NO
262.52	2.	Does the plan describe arrangements made with emergency response personnel?	(YES) NO

3. Does the plan list the name(s), home address, and phone number(s) of the designated emergency coordinator(s)? YES (NO)

265.55 4. Is an emergency coordinator available at all times? (YES) NO

5. Does the plan include a list of all emergency equipment at the facility, its location, a physical description of each item on the list, and a brief outline of its capabilities? (YES) NO

6. Does the plan include an evacuation plan for facility personnel? (YES) NO

Contingency plan and emergency procedures requirements:

[ ] Adequate [X] Inadequate Change in Emergency Coordinator List

---

J. Manifest System, Recordkeeping, and Reporting

265.71 1. Does the facility receive waste from off-site? (YES) NO

a. If yes, does the owner/operator sign and date each copy of the manifest and give a signed copy to the transporter? (YES) NO NA

b. Does the owner/operator send a signed copy of the manifest to the generator within 30 days of the delivery? (YES) NO NA

c. Does the owner/operator retain a copy of manifest? (YES) NO NA

2. Does the facility receive any waste from a rail or water (bulk shipment) transporter? YES (NO)

a. If yes, is the shipment accompanied by a shipping paper containing the appropriate information? YES NO (NA)

1. If yes, does the owner/operator sign and date the shipping paper and provide the transporter with a copy? YES NO (NA)

2. Does the owner/operator send a signed copy of the shipping paper to the generator within 30 days of the delivery? YES NO (NA)

3. Does the owner/operator retain a copy of the shipping paper? YES NO (NA)

365.72 3. Has the facility received any shipments of waste which were inconsistent with the manifest? YES (NO)

a. If yes, was an attempt made to reconcile the discrepancy with the generator and transporter? YES NO (NA)

1. If no, was the Regional Administrator notified? YES NO (NA)

265.73 4. Does the owner/operator keep a written operating record at the facility? (YES) NO

a. If yes, does the operating record include:

1. A description and the quantity of each hazardous waste received, and method(s) and date(s) of its treatment, storage, and disposal? (YES) NO NA

2. The location of each hazardous waste within the facility and the quantity at each location? (YES) NO NA

3. Records and results of waste analyses? (YES) NO NA

4. Reports and details of incidents requiring implementation of the contingency plan? YES NO (NA)

5. Records and results of required inspections? (YES) NO NA

6. Monitoring, testing, or analytical data? (YES) NO NA

7. Closure cost estimates (and for disposal facilities, post-closure cost estimates)? (YES) NO NA

265.76 5. Has the facility received any waste, which does not fall under the small generator exclusion, not accompanied by a manifest or shipping paper? YES (NO)

a. If yes, was an unmanifested waste report submitted to the Regional Administrator? YES NO (NA)

Manifest system, recordkeeping, and reporting requirements:

[X] Adequate [ ] Inadequate

K. Closure and Post-Closure

265.112 1. Does the owner/operator have a written closure plan for the facility? (YES) NO

a. If yes, does the plan include:

1. A description of how and when the facility will be closed? (YES) NO

2. A description of the steps necessary to completely close the facility? YES NO

3. An estimate of the maximum inventory of wastes in storage or in treatment at any given time during the facility life? YES NO

4. A description of the steps needed to decontaminate facility equipment at the time of closure? YES NO

5. An estimate of the expected year of closure and a schedule for final closure which includes the total time required to close the facility and the time required for intervening closure activities which allow tracking closure progress? YES NO

265.118 2. If the facility is a disposal facility, does the owner/operator have a written post-closure plan? YES NO (NA)

a. If yes, does the plan include:

1. Ground-water monitoring activities and frequencies at which they will be performed? YES NO (NA)

2. Maintenance activities and frequencies at which they will be performed to ensure the integrity of the cap and containment structures where applicable, and the function of the monitoring equipment? YES NO (NA)

3. The name, address, and phone number of the person or office to contact during the post-closure period? YES NO (NA)

Closure and post-closure requirements:

[ ] Adequate [ ] Inadequate

L. Financial Requirements

265.142 1. Does the owner/operator have a written estimate of the closure cost? YES NO

265.143 2. Has the owner/operator established financial assurance for facility closure and notified the Regional Administrator? (Required after 7-6-82). YES NO

265.144 3. If the facility is a disposal facility, does the owner/operator have a written estimate of the annual cost of post-closure monitoring and maintenance of the facility? YES NO NA

265.145 4. Has the owner/operator of the disposal facility established financial assurance for post-closure care and notified the Regional Administrator? (Required after 7-6-82) YES NO NA

265.147 5. Has the owner/operator obtained liability insurance for sudden occurrences of at least $1 million with an aggregate of at least $2 million exclusive of legal defense costs? (Effective 7-15-82). YES NO

6. If the facility is a disposal facility, has the owner/operator obtained liability insurance for nonsudden and accidental occurrences of at least $3 million per occurrence with an annual aggregate of at least $6 million exclusive of legal defense costs? (Effective 7-15-82) YES NO NA

Financial requirements:

[ ] Adequate [ ] Inadequate

M. Management of Containers

265.170 1. Are containers presently used to store hazardous waste? (YES) NO

a. If no, do not complete questions 2-5.

b. If yes, check condition of containers and for evidence of incompatibility of waste with containers.

Containers in poor condition

Condition of Containers:

[ ] Adequate [X] Inadequate [ ] Not Applicable

265.173 2. Are all containers holding hazardous waste closed during storage except when necessary to add or remove waste? (YES) NO NA

265.174 3. Does owner/operator inspect areas where containers are stored, at least weekly, for signs of leakage and/or deterioration caused by corrosion or other factors? (YES) NO NA

265.176 4. Are containers holding ignitible or reactive waste located at least 15 meters (50 feet) from the facility's property line? (YES) NO NA

265.177 5. If waste in containers is incompatible with other materials stored nearby, in other containers, piles, open tanks, or surface impoundments, are the containers separated from the other materials by means of a dike, berm, wall, or other device? (YES) NO NA

Management of Containers:

[X] Adequate [ ] Inadequate [ ] Not Applicable

Note: Determine if owner/operator claims any information confidential.

Note: Fill out applicable checklists for specific facility types (i.e. tanks, surface impoundments, piles, land treatment, landfills, groundwater monitoring).

Additional Information and CONCLUSIONS_____

Kansas Department of Health and Environment
Bureau of Waste Management
Forbes Field, Topeka, Kansas 66620
(913) 296-1600

Tank Inspection Checklist

Owner Information

Date 7-28-92 EPA I.D. No. KSD007246846

Facility Name Hydrocarbon Recyclers, Inc.

Street 2549 N. New York

City Wichita, Kansas Zip 67219

Tank information

	Tank #1	Tank #2	Tank #3
Description:	See attached sheet.		
Capacity:			
Substance Stored:			
Waste Code:			
Location:			

Existing Tank System(s)

I. Is the tank(s) labeled with the words "Hazardous Waste"? (K.A.R. 28-31-4) (Yes) No

II. If the tank(s) is not covered, does it have at least 2 feet (60 cm) of freeboard unless equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would provide? (40 CFR 265.192(c)) Yes No (NA)

III. Is the tank(s) equipped with a waste-feed cutoff or bypass system(s) as required by 40 CFR 265.192(b and d)? (Yes) No

IV. Are daily inspections made of all systems pertinent to the proper operation of the tank? (Yes) No

A Discharge and cutoff systems? (Yes) No NA

B. Tank level and freeboard? Yes No (NA)

C. Drainage systems? Yes No (NA)

D. Above-ground portions for corrosion? (Yes) No NA

E. Monitoring and leak detection equipment? (Yes) No NA

F. Secondary containment? (Yes) No NA

V. Are these inspections documented in a log? (Yes) No

A. In the case of a permitted T/S/D facility, do they follow the inspection schedule outlined in their permit? (Yes) No NA

VI. Has the tank(s) been used to treat or store wastes substantially different from previous wastes or have substantially different treatment processes been used in the tank(s)? Yes (No)

A. If yes, were waste analyses and trial treatment or storage tests conducted prior to implementing the proposed changes and is all the data kept on file in the facility operating record or was written, documented information on similar storage or treatment process changes obtained prior to implementing the proposed changes and is all documentation kept on file in the facility operating record? Yes No (NA)

VII. With the exception of emergency situations, have ignitable or reactive wastes been placed in the tank(s) by the facility? (Yes) No NA

A. If yes, has the facility insured the safety of the operation by one or both of the following methods (40 CFR 265.98)?

1. Was the waste treated immediately before or after being placed in the tank(s) so that it is no longer ignitable or reactive and such treatment is done in compliance with the safety requirements of 40 CFR 265.15(b)? Yes (No) NA

2. Was the waste stored or treated under protected conditions eliminating the possibility of ignition or reaction? (Yes) No NA

VIII. If a covered tank(s) is used to treat or store ignitable or reactive wastes, does the facility meet the NFPA buffer zone requirements? (40 CFR 265.198(b)) (Yes) No NA

IX. If incompatible waste materials are placed in the same tank(s) or are put in a contaminated tank(s), is this done under completely controlled and safe conditions as specified in 40 CFR 265.199? Yes No (NA)

X. If the tank(s) has cathodic protection systems, is it inspected according to the following schedule (40 CFR 265.195(b))? Yes No (NA)

A. Was proper operation confirmed within 6 months of installation and annually thereafter? Yes No (NA)

B. Are induced current sources inspected/tested at least bimonthly? Yes No (NA)

C. Are records maintained of these inspections? Yes No (NA)

XI. Was the tank(s) used for the management of hazardous waste prior to July 14, 1986? (Yes) No NA

A. If yes, does the tank system(s) have secondary containment? (Yes) No NA

B. If no, has a written assessment that attests to the integrity of the tank(s) been prepared by an independent registered engineer? (Yes) No NA

If yes, did the assessment include the following:

1. Design standards according to which the tank and ancillary equipment were constructed? (Yes) No

2. Existing corrosion protection measures? Yes No (NA)

3. Hazardous characteristics of the waste to be handled? (Yes) No

4. Documented age of the tank system (if available) or estimate of the age? (Yes) No

5. Results of a leak test, internal inspection, or other tank integrity examination? (If the results of this test show the tank to be leaking or unfit for use, the owner must implement 40 CFR 265.196.) (Yes) No

6. Is the leak test conducted annually by an independent, qualified, registered engineer? (40 CFR 265.193(i)(1) and (2)) (Yes) No

7. Are records of the assessment results maintained on file at the facility? (Yes) No

Schedule date when secondary containment is required per schedule in 40 CFR 265.193(a) (1 through 5). _____

Existing Tank System(s)	☒ Adequate	☐ Inadequate

New Tank System(s)

XII. Is the tank system(s) required to have secondary containment (new system or according to schedule in 40 CFR 265.193(a)(1 through 5)? (Yes) No

A. If yes, has the owner or operator requested a variance from the secondary containment? (40 CFR 265.193(g and h) Yes (No) NA

B. If yes, does the secondary containment meet the following minimum requirements? (40 CFR 265.193(b and c)

1. Constructed of or lined with materials compatible with the waste and of sufficient strength? (Yes) No NA

2. Placed on a structurally adequate foundation? (Yes) No NA

3. Provided with a leak detection system capable of detecting releases within 24 hours? (Yes) No NA

4. Adequately sloped or designed and operated to drain and remove liquids from leaks, spills or precipitation? (Yes) No NA

C. If yes, does the secondary containment include one of the following: (40 CFR 265-193(d))

1. External liner? Yes (No) NA

2. Vault? (Yes) No NA

3. Double-walled tank? Yes (No) NA

4. Equivalent device approved by the Secretary? Yes No (NA)

D. If yes, does the secondary containment satisfy the following requirements: (40 CFR 265.193(e))

For External Lines and Vaults

1. Adequate capacity to contain 100% of the largest tank within its boundary? (Yes) No NA
2. Designed or operated to prevent infiltration of precipitation into the containment system unless it has adequate capacity to contain a 25 year, 24 hour rain event? (Yes) No NA
3. Free of cracks or gaps? (Yes) No NA
4. Completely surrounds the tank and surrounding earth likely to be exposed to waste if a release occurs? (Yes) No NA

For Vaults

1. Constructed with chemical-resistant water stops at all joints? (Yes) No NA
2. Provided with an impermeable coating or lining over the concrete? (Yes) No NA
3. Protected against vapor ignition, if required due to the waste characteristics? Yes No (NA)
4. Provided with an exterior moisture barrier? Yes No (NA)

For Double-Walled Tanks

1. Designed as an integral structure for containment of releases? Yes No (NA)
2. If metal, is it protected from corrosion, if metal? Yes No (NA)
3. Provided with a built-in continous leak detection system capable of detecting releases within 24 hours? Yes No (NA)

XIII. Is ancillary equipment provided with adequate secondary containment? (40 CFR 265-193(f)) (Yes) No NA

XIV. Has the tank system or secondary containment system had a leak or spill or was it determined to be unfit for use? Yes (No) NA

A. If yes, was it immediately removed from service and appropriate follow-up actions taken as required by 40 CFR 265.196 (b through e)? Yes No (NA)

XV. If extensive repair has been conducted on the tank system was it recertified in accordance with 40 CFR 270.11(d) and such certification submitted to the Secretary within 7 days? (40 CFR 265.196(f)) Yes No (NA)

New Tank System Requirements	☒ Adequate	☐ Inadequate

Comments: _____

4.3

Hazardous Waste Tank Storage (S02) Service[1]

VESSEL	CAPACITY - WORK (gal)	CAPACITY - MAX (gal)	LOCATION
V-1	7,181	7,363	Process Area
V-2	7,084	7,084	Process Area
V-3	7,181	7,363	Process Area
V-4	7,181	7,363	Process Area
V-5	20,895	20,895	Process Area
V-6	20,895	20,895	Process Area
V-7	7,181	7,363	Process Area
V-8	7,181	7,363	Process Area
V-9	5,078	5,078	Building D
V-10	5,078	5,078	Building D
V-11	5,078	5,078	Building D
V-12	5,078	5,078	Building D
V-13	5,078	5,078	Building D
V-14	5,078	5,078	Building D
V-15A	2,659	2,659	Building D
V-15B	2,659	2,659	Building D
V-15C	2,659	2,659	Building D
V-15D	2,659	2,659	Building D
V-16	9,028	9,028	Building D
V-17	522	522	Process Area
V-18	489	489	Building D
V-26	1,129	1,155	Process Area
V-29	90	90	Building D
V-30	90	90	Building D
V-31	115	115	Building D
V-32	115	115	Building D
V-34	539	539	Process Area
TOTAL	138,000	138,936	N/A

Bethlehem Apparatus Company, Inc.

890 Front St., P.O. Box Y, Hellertown, PA 18055 • 215-838-7034 • FAX 215 838-6333 • TELEX 494-9195

DATE: March 16, 1992

CUSTOMER: USPCI Hydrocarbon Recovery Services
2549 N. New York
Wichita, KS 67219

ATTN: Joe Dowdey

Materials outlined in Waste Profile No. R-6571 dated 3/12/92 have been approved for Mercury Recovery/Recycling.

Bethlehem is strictly a mercury recovery/recycling facility, and cannot accept manifested materials with Waste Codes other than D009. If materials are sent under Waste Code U151, we may have to reject the shipment.

We will only accept materials packaged in steel containers; flasks, 5 gallon, 55 gallon, or 85 gallon. Materials shipped in plastic or fiber containers will not be accepted for delivery.

Bethlehem will issue a work order to our receiving dock to accept your material for processing provided the following:

X A purchase order is issued to cover the costs of processing.

X An updated Mercury Recovery/Recycling Agreement is signed and returned for our files.

_____ Credit terms have been established.

Shipments will not be received without work authorization. Please be sure the above items are established before shipment is made.

If you have any questions, please let us know.

Yours very truly,

BETHLEHEM APPARATUS COMPANY, INC.

Bruce J. Lawrence
President

BJL/jps

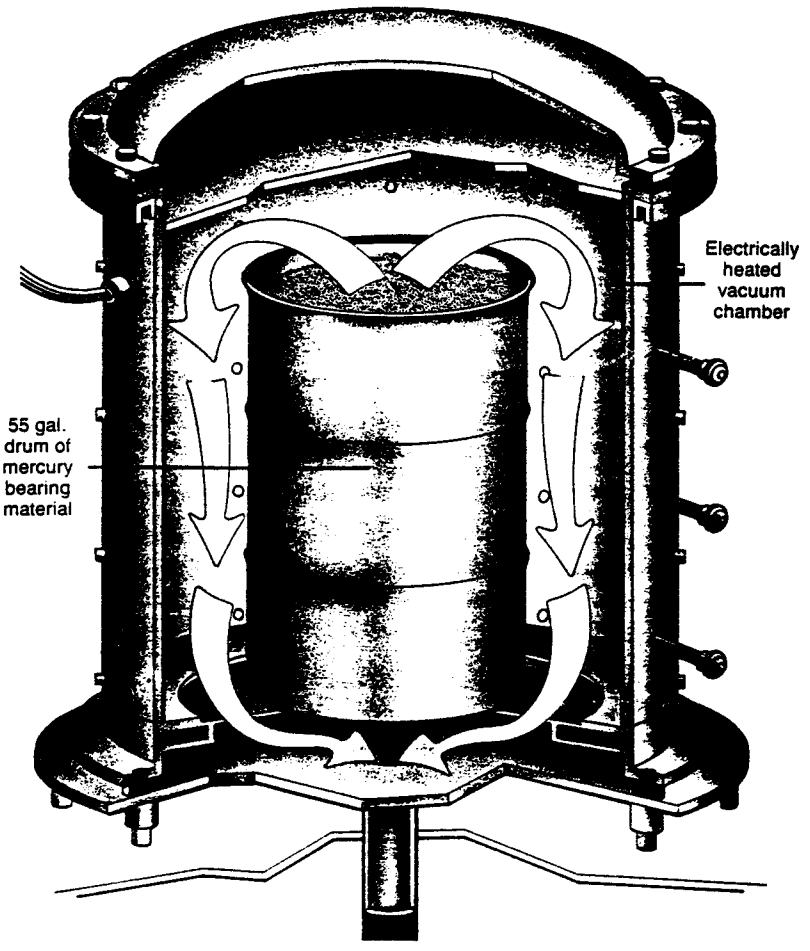
NOTE: A Land Ban form is now required with each shipment.

BETHLEHEM
MERCURY RECOVERY/RECYCLING SERVICE

Bethlehem has developed a high vacuum mercury retort recovery still for processing EPA D009 hazardous waste. The recovery system heats mercury bearing materials up to 1,350 degrees F. Mercury vapor is condensed in a water cooled condenser for transfer to our vacuum triple distillation units. Since the recovery system operates under high vacuum the exhaust from the vacuum pumps is easily scrubbed and passed through treated activated charcoal for mercury vapor removal. No exhaust stack or Air Quality Permits are required for the system. Residue from the process must pass TCLP analysis for mercury before it is sent to an industrial non hazardous waste landfill.

Each mercury recovery high vacuum retort system is controlled with a microprocessor temperature controller capable of running 16 different programmed temperature cycles for the wide variety of materials to be processed. To date we have processed the following types of materials:

- fever and industrial thermometers
- metal switches
- quartz lamps
- dental amalgams
- ignitron tubes
- mercury in soil
- telephone switches
  porisimitry samples
- sphygmomonometers
- barometers
- glass switches
- mercury batteries
- thermocouples
- mercury sludges
- mercury rectifiers
- mercury relays
  manometers
- mercuric oxide
- pc board relays



FOR MORE INFORMATION ASK FOR A MERCURY RECOVERY PACKET!

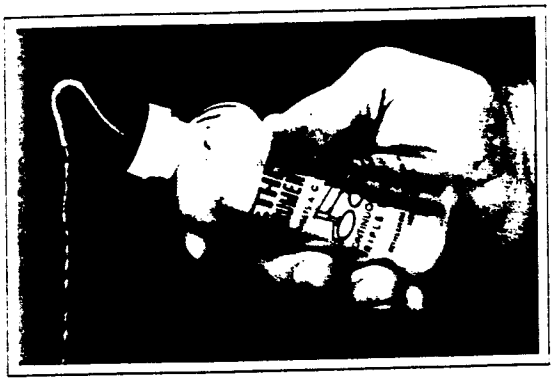
All shipments must have prior approval before they are accepted for processing. All materials that are processed in our recovery retort distillation units are considered HAZARDOUS WASTE, and must be sent using a Pennsylvania Hazardous Waste Manifest.

To receive authorization for shipments you must obtain a **work authorization number** from our office. Authorization numbers will be issued for each shipment provided there is a signed Recovery/Recycling Agreement on file and your waste is on our Material Acceptance List. For new materials to be approved there must be samples and material analysis sent for evaluation.

Bethlehem Apparatus Company, Inc.

890 Front St., P.O. Box Y, Hellertown, PA 18055 • 215-838-7034 • FAX 215-838-6333 • TELEX 494-9195

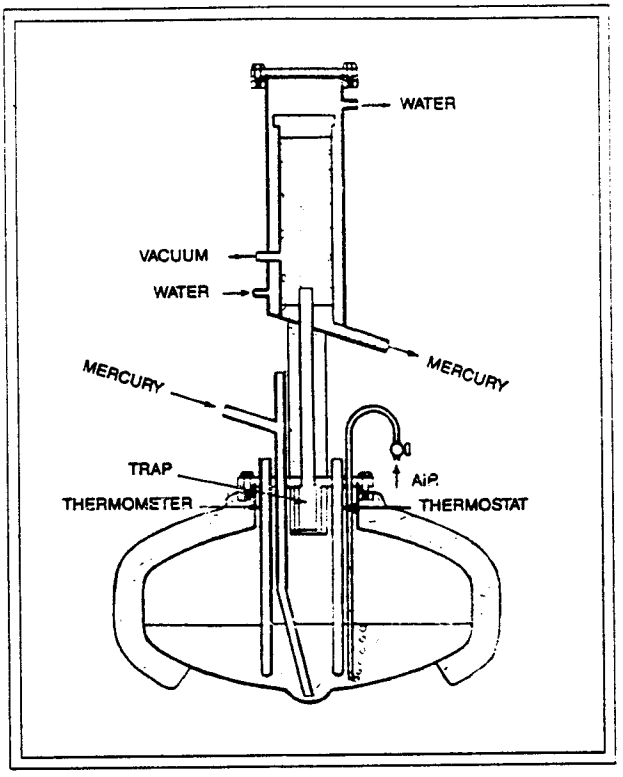
BETHLEHEM
CONTINUOUS VACUUM TRIPLE DISTILLATION



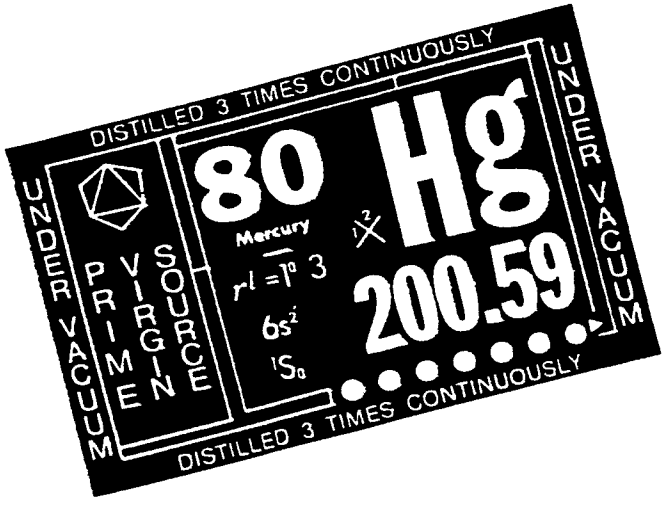
Best in PURITY PACKAGING SERVICE

OVER 7 (SEVEN) MILLION POUNDS SHIPPED to manufacturers, research laboratories, process and control industries.

SINGLE STAGE MERCURY Still and Condenser, Schematic Diagram. Three stages of this type operating in tandem are required to produce the highest purity mercury, needed in crystal growth technology systems and other high purity applications.



...only from BETHLEHEM PRIME VIRGIN SOURCE MERCURY



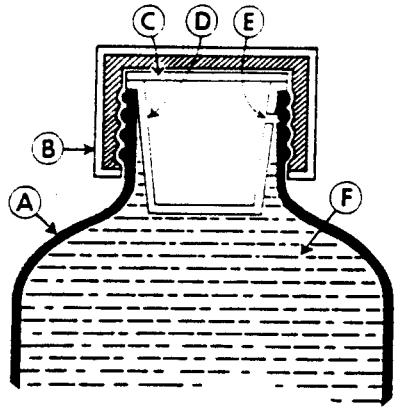
Bethlehem now exclusively offers guaranteed prime virgin source mercury, vacuum triple distilled and packaged in glass or polyethylene bottles with Bethlehem's patented* Thimble Trap. Analysis of this metal by Atomic Absorbtion shows values near or below detection limits (see analysis).

ANALYSIS OF EVAPORATED MERCURY RESIDUE SAMPLE IN PARTS PER BILLION*

ALUMINUM	0.11
CADMIUM	0.088
CALCIUM	0.088
CHROMIUM, total	0.16
COPPER	1.79
IRON	1.06
LEAD	0.10
MAGNESIUM	0.010
MANGANESE	0.14
MERCURY	0.0015
NICKEL	0.043
SILVER	0.0058
TIN	0.32
TITANIUM	0.029
ZINC	0.042
BORON	< 1.88
SILICON	0.51

*Based on 300 lbs. (168,000 grams) of distilled Mercury.

BETHLEHEM THIMBLE-TRAP* GLASS BOTTLE PACKAGING



A glass bottle
B phenolic cap
C polyethylene liner
D polyethylene thimble
E overspill thimble-trap
F prime virgin source mercury—continuously distilled three times under vacuum

With Bethlehem's patented, "THIMBLE TRAP", continuously vacuum triple distilled prime virgin source mercury can be shipped, for the first time, without ring formation at the meniscus and oxides on the mercury surface. For technical details ask for reprint "Mysterious Ring Appears at Meniscus of Bottled Mercury", Ind. Res. Feb. 1982.

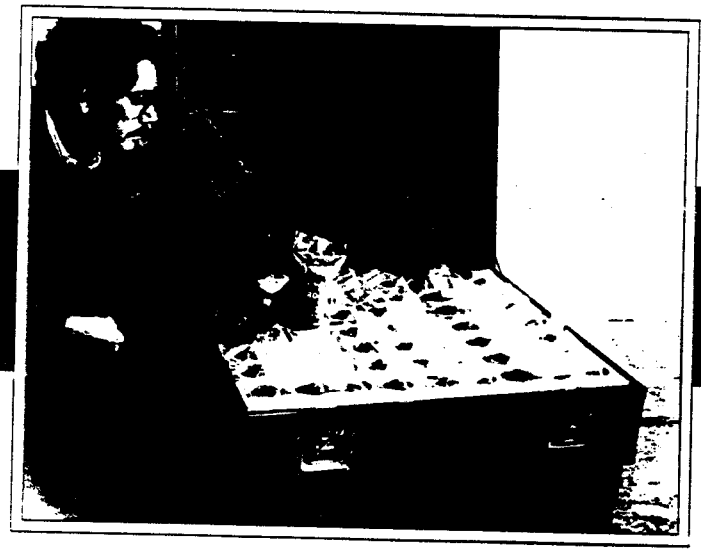
*Patent No. 4,416,382

RETURNABLE SHIPPING CONTAINERS

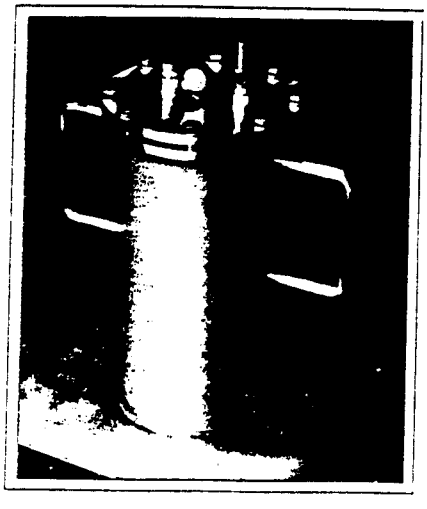
Mercury Reusable Shipping Containers

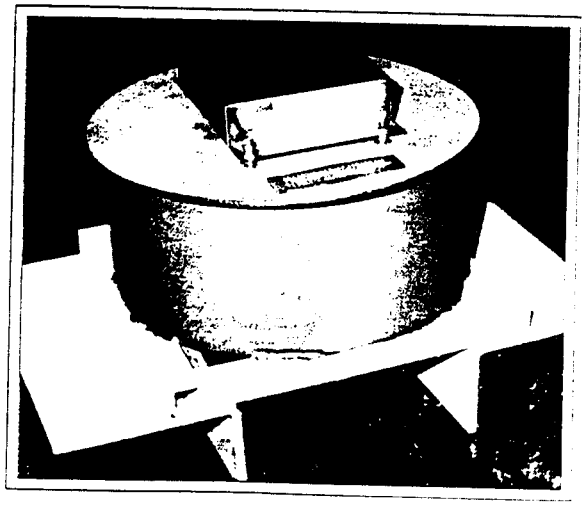
Stainless Steel Containers: 100 lb., 800 lb., 2,000 lb. Each container has a flanged top plate with a compression fitting for air pressure inlet, a pressure relief valve, and a 1/4" pipe out.

The "WELLS FARGO" styrofoam lined steel box with security lock for 10 lb. glass bottles sealed in individual polyethylene bags. Holds 63 units with patented "THIMBLE TRAP".



11 lb. glass bottles in "WELLS FARGO" steel box





BETHLEHEM MERCURY CLEANING

We clean our Mercury by distilling three times in continuous stages under high vacuum and controlled low temperatures. All instrument Mercury is shipped with a Certificate of Analysis.

We Return our cleaned mercury in 8.5 oz., 1-, 6-, and 16 pound polyethylene bottles; or 1-, 5-, or 10 pound glass bottles. The small polyethylene bottles have dispensing tips. The glass bottles use the patented **"THIMBLE TRAP"** system. All shipments are in full bottles. Charges for new mercury or credits for purchased scrap mercury are applied to the nearest full bottle.

Mercury Flasks, the standard shipping container for 99% liquid mercury, can be obtained at no charge if the mercury is being sent back for cleaning. 76 lb. capacity and 2,000 lb. capacity flasks are available. There may be a charge for disposal of liquid mercury.

Terms: 30 days net for cleaning mercury. All mercury received and shipped F.O.B. Hellertown, PA. **Do not send mercury by US PARCEL POST.** It is against Postal Regulations.

REPROCESSING SHRINKAGE SCHEDULE FOR MERCURY RECEIVED AS LIQUID METAL

Net Wt.	% Loss	Net Wt.	% Loss
0- 49 lbs.	5%	500-999 lbs.	1.5%
50-199 lbs.	3%	1000+ lbs.	1%
200-499 lbs.	2.5%		

Bethlehem Apparatus Company, Inc.
890 Front St., P.O. Box Y, Hellertown, PA 18055 • 215-838-7034 • FAX 215-838-6333 • TELEX 494-9195

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-92

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. | Manifest Document No.: [illegible] | 9 D | R D

2. Page 1 of 1 | Information in the shaded areas is not required by Federal law.

GENERATOR

3. Generator's Name and Mailing Address
Van Waters & Rogers Inc.
3900 D Street, Omaha, NE 68107
4. Generator's Phone (402) 733-7909

Emergency Phone:
CHEMTREC 1-800-424-9300

A. State Manifest Document Number

B. State Generator's ID

5. Transporter 1 Company Name
Van Waters & Rogers Inc.

6. US EPA ID Number: E E D 0 4 0 9 0 6 7 2 9

C. State Transporter's ID NED040906729

D. Transporter's Phone

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
Hydrocarbon Recyclers Inc.
2549 N. New York St.
Wichita, KS ~~6673~~ 67219

10. US EPA ID Number: K S D 0 0 7 2 4 6 8 4 6

G. State Facility's ID
KSD007246846

H. Facility's Phone
316-268-9490

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	HM	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ Waste flammable ~~liquid~~, Solid, N.O.S. flammable solid, UN 1325 (F005,F003,D001,D035) (Methyl Ethyl Ketone, Xylene)(ERG 32)	X	001	DM	00508	P	F005, F003, D001, D035
b.						
c.						
d.						

J. Additional Descriptions for Materials Listed Above
A. Byron Originals
Lot#16153
Profile# 89532 (WI 91-4617)

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: Scott J. Obrien KWK | Signature | Month Day Year: 10 15 92

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: X Robert Connelly KWK | Signature: Robert Connelly | Month Day Year: 10 15 92

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name | Signature | Month Day Year: 10 21 92

Style F15 REV-6 Printed by Labelmaster, An American Labelmark Co., Chicago, IL 60646 (800)621-5808

EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

PRINTED ON RECYCLED PAPER

USPCI, INC.

RECYCLING/TSD HANDLING AGREEMENT

(GENERATOR AND RECYCLING/TSD CONTRACTOR)

WHEREAS, Generator produces spent chemicals which may be considered to be "hazardous" or "toxic" within the meaning of applicable federal and state laws ("Spent Chemicals") and which therefore must be transported, stored, disposed of, recycled, treated or re-used ("Handled") in accordance with applicable laws pertaining to hazardous or toxic chemicals;

WHEREAS, Recycling/TSD Contractor owns or controls facilities which are capable of Handling Spent Chemicals in accordance with all applicable laws pertaining to such activities;

WHEREAS, the parties desire to enter into an arrangement for the Handling of Spent Chemicals, all on the terms and conditions hereinafter set forth;

NOW, THEREFORE, in consideration of the covenants and agreements contained herein, the undersigned agree to the following terms and conditions of this Recycling/TSD Handling Agreement as well as to the Standard Terms and Conditions Governing the Handling of Spent Chemicals ("Standard Terms and Conditions"), which are attached to the Generator copy of this Agreement and are incorporated herein by reference. All capitalized terms not otherwise defined herein shall have the meanings set forth in the Standard Terms and Conditions.

1. SPENT CHEMICALS SHIPMENT. The completed Uniform Hazardous Waste Manifest or appropriate state manifest which is identified by the reference number appearing in a space below the signatures to this Agreement and which pertains to the Spent Chemicals Shipment Handled under this Agreement is hereby incorporated herein by reference. Such manifest describes certain Spent Chemicals which Generator hereby agrees to ship to Recycling/TSD Contractor and which Recycling/TSD Contractor agrees to Handle at the facility named in such manifest ("Designated Facility").

2. COLLECTION, TRANSPORTATION, STORAGE AND DELIVERY. All Spent Chemicals Shipments shall be transported to Recycling/TSD Contractor by Van Waters & Rogers Inc., a Washington Corporation ("VW&R"), or an entity designated by VW&R to provide transportation and temporary storage services.

3. PAYMENT. It is understood that VW&R shall pay Recycling/TSD Contractor for Handling the Spent Chemicals Shipment (or, where money is owed to Generator, VW&R shall pay Generator for the Spent Chemicals Shipment) according to the terms of a certain Master Spent Chemicals Handling Agreement between Recycling/TSD Contractor and VW&R. Recycling/TSD Contractor shall not look to Generator for payment for Handling the Spent Chemicals Shipment, except for certain extraordinary charges incurred in connection with Non-conforming Spent Chemicals as set forth in the Standard Terms and Conditions.

4. INDEMNIFIED PARTY. As used in the Standard Terms and Conditions, the term "Indemnified Party" shall mean either Recycling/TSD Contractor or Generator, depending upon which party claims indemnification under this Agreement.

5. GENERATOR INDEMNIFICATION. Generator shall defend, indemnify and hold harmless Recycling/TSD Contractor, its past, present and future officers, directors, employees, agents, insurers and successors (hereinafter in this Paragraph referred to collectively as "Recycling/TSD Contractor") from and against any and all Loss which Recycling/TSD Contractor may sustain or incur, be responsible for or pay out as a result of:

(a) Generator's breach of any representation, warranty, term or provision of this Agreement; or

(b) The negligence or intentional misconduct of Generator, its employees, agents, representatives or subcontractors in the performance of this Agreement, provided that such indemnification shall not apply to the extent such liabilities result from Recycling/TSD Contractor's negligence or intentional misconduct or from a breach of this Agreement by Recycling/TSD Contractor.

6. NAMES AND ADDRESSES OF PERSONS TO WHOM NOTICE IS TO BE GIVEN. The name of the person to whom notice is to be given on behalf of Generator appears on the Uniform Hazardous Waste Manifest in Item 16 or the appropriate state manifest. The name of the person to whom notice is to be given on behalf of Recycling/TSD Contractor appears on the Uniform Hazardous Waste Manifest in Item 20 or the appropriate state manifest. The addresses of the persons to whom notice is to be given appear on the Uniform Hazardous Waste Manifest under Item 3 (for Generator) and Item 9 (for Recycling/TSD Contractor) or the appropriate state manifest.

RECYCLING/TSD HANDLING AGREEMENT

(GENERATOR AND RECYCLING/TSD CONTRACTOR)

The undersigned hereby agree that, upon execution of this Recycling/TSD Handling Agreement, there is a binding contract between them according to the above terms and conditions, as of the day and year appearing below.

GENERATOR EPA ID#: IAD182163520

FACILITY: Byron Originals Inc.

PRINT NAME: Brian Bond TITLE: Safety Director

X

SIGNATURE: Brian Bond DATE: 05/14/92

UNIFORM HAZARDOUS WASTE MANIFEST DOCUMENT NUMBER: 9 2 0 0 2

STATE HAZARDOUS WASTE MANIFEST DOCUMENT NUMBER _____

RECYCLING/TSD CONTRACTOR:

PRINT NAME: Daniel W. Belger TITLE: Vice President-Sales

SIGNATURE: Daniel W. Belger Jr.

RECYCLING/TSD CONTRACTOR SHIPMENT APPROVAL NUMBER 89532 (WI 91-4617)

USP- 14286 -C

Van Waters & Rogers Inc.
. . . subsidiary of Univar

P. O. BOX
OMAHA, NE 68107-
PHONE (402) 733-

This Land Disposal Restriction Statement is being forwarded from the original generator of the waste.

Van Waters & Rogers Inc.
EPA ID# NED040906729
has acted as a RCRA storage facility.

The Waste is being manifested from storage on Van Waters & Rogers Inc. Manifest # 92037.

Jeanette Gallen (VWR)
5-26-92

EWDHRI-Wichita

USPCI

Form LDR

Notification of Wast
Subject to Land Disposal Restriction

Manifest number associated with waste shipment	Generator Name
92002	Byron Originals Inc.

Pursuant to 40 CFR 268.7 (a), I hereby notify USPCI that this waste shipment contains a waste(s) that is (are) restricted under l land disposal restrictions contained in either 40 CFR 268 or RCRA Section 3004 (d). This shipment contains one or more of t following wastes which are subject to the listed treatment requirements.
Waste code overlap require all applicable codes, including characteristics, be applied even to listed (F,K,U,P) wastes

Waste (check appropriate boxes)

Treatment Standard

1. ☐ California List Waste (applies to all states) — Complete Reverse Side

2. ☑ F-Solvents ☐ F001 ☐ F002 ☑ F003 ☐ F004 ☑ F005. — Complete Reverse Side

3.

	List all D,F,K,U, or P Waste Codes (eg. F006, D003)	Subcategory (if any)	Treatability Group (eg. wastewater or nonwastewater)	Treatment Standard in 40CFR 268.41(a)	268.42 (a)	268.43 (a)	If Required Method Insert proper 5-letter code	USPCI acceptan
A.	F005		NWW	X				89532
B.	F003		NWW	X				
C.	D001	High TOC	NWW		X		FSUBS, RORGS, INCIN	
D.	D035	No treatment standard set						
E.								
F.								
G.								
H.								
I.								
J.								
K.								
L.								
M.								
N.								
O.								
P.								

☐ Multi-source leachate F039 — Treatment Standards attached Constituents which are applicable are m

NOTE: "Wastewater" means a waste containing less than 1% filterable solids and less than 1% T.O.C.

Deadline Extensions

Certain LDR restricted wastes are permitted to be placed in a land disposal unit after the deadline provided they meet othe applicable conditions. Restricted wastes which qualify for a deadline extension are as follows:

Check applicable date:	List waste codes for which extension applies
☐ November 8, 1990	
☐ May 8, 1992	
☐ Other: please provide date	

EWDOC:990

MARK ONLY THOSE CONSTITUENTS WHICH APPLY

268.41 Table CCWE—Constituent Concentrations In Waste Extract

F001-F005 spent solvents	Concentration (in mg/l)	
	Wastewaters containing spent solvents	All other spent solvent wastes
Acetone	0.05	0.59
n-Butyl alcohol	5.0	5.0
Carbon disulfide	1.05	4.81
Carbon tetrachloride	0.05	0.96
Chlorobenzene	0.15	0.05
Cresols (& Cresylic acid)	2.82	0.75
Cyclohexanone	0.125	0.75
1,2-Dichlorobenzene	0.85	0.125
Ethyl acetate	0.05	0.75
Ethylbenzene	0.05	0.053
Ethyl ether	0.05	0.75
Isobutanol	5.0	5.0
Methanol	0.25	0.75
Methylene chloride	0.20	0.93
Methyl ethyl ketone	0.05	0.75
Methyl isobutyl ketone	0.05	0.33
Nitrobenzene	0.66	0.125
Pyridine	1.12	0.33
Tetrachloroethylene	0.079	0.05
Toluene	1.12	0.33
1,1,1-Trichloroethane	0.078	0.05
1,1,2-Trichloro-1,2,2-Trifluoroethane	1.05	0.41
Trichloroethylene	0.062	0.091
Trichlorofluoromethane	0.05	0.98
Xylene	0.05	0.15

268.43 Table CCW—Constituent Concentrations In Wastes

F001, F002, F003, F004 and F005 wastewaters (Pharmaceutical Industry)	Concentration (in mg/l)
Methylene chloride	0.44

F002 and F005	Concentration	
	In mg/l(ww)	mg/kg(nww)
1,1,2-Trichloroethane (F002)	0.030	7.8
Benzene (F005)	0.070	3.7
2-Nitropropane (F005)	Required Method(s)	
2-Ethoxyethanol (F005)	Required Method(s)	

California List Waste (applies to all states)

Liquid hazardous waste including free liquids associated with any solid or sludge containing the following constituents or characteristic:

	Concentration	Treatment Standard
pH ≤ 2.0		Neutralize/Stabilize
Cyanides	≥ 1,000	Cyanides Destruction/Stabilize
Arsenic	≥ 500	Metals Recovery/Solidification
Cadmium	≥ 100	Metals Recovery/Solidification
Chromium (VI)	≥ 500	Metals Recovery/Solidification
Lead	≥ 500	Metals Recovery/Solidification
Mercury	≥ 20	Metals Recovery/Solidification
Nickel	≥ 134	Metals Recovery/Solidification
Selenium	≥ 100	Metals Recovery/Solidification
Thallium	≥ 130	Metals Recovery/Solidification
PCBs	≥ 50	Incineration/High Efficiency Boiler
Solid, sludge, or liquid Halogenated Organic Compounds (HOCs) listed in 40 CFR 268 Appendix II	≥ 1,000	Incineration/Carbon Adsorption/Solvent Extraction

POTENTIAL HAZARDS

FIRE OR EXPLOSION

Flammable/combustible material; may be ignited by heat, sparks or flames.
May burn rapidly with flare-burning effect.

HEALTH HAZARDS

Fire may produce irritating or poisonous gases.
Contact may cause burns to skin and eyes.
Runoff from fire control or dilution water may cause pollution.

EMERGENCY ACTION

Keep unnecessary people away; isolate hazard area and deny entry.
Stay upwind; keep out of low areas.
Positive pressure self-contained breathing apparatus (SCBA) and structural firefighters' protective clothing will provide limited protection.
CALL CHEMTREC AT 1-800-424-9300 FOR EMERGENCY ASSISTANCE.
If water pollution occurs, notify the appropriate authorities.

FIRE

Small Fires: Dry chemical, sand, earth, water spray, or regular foam.
Large Fires: Water spray, fog or regular foam.
Move container from fire area if you can do it without risk.
Apply cooling water to sides of containers that are exposed to flames until well after fire is out. Stay away from ends of tanks.
For massive fire in cargo area, use unmanned hose holder or monitor nozzles; if this is impossible, withdraw from area and let fire burn.
Magnesium Fires: Use dry sand, Met-L-X® powder or G-1 graphite powder.

SPILL OR LEAK

Shut off ignition sources; no flares, smoking or flames in hazard area.
Do not touch or walk through spilled material.
Small Dry Spills: With clean shovel place material into clean, dry container and cover loosely; move containers from spill area.
Large Spills: Wet down with water and dike for later disposal.

FIRST AID

Move victim to fresh air; call emergency medical care.
In case of contact with material, immediately flush skin or eyes with running water for at least 15 minutes.
Removal of solidified molten material from skin requires medical assistance.
Remove and isolate contaminated clothing and shoes at the site.

HAZARDOUS WASTE RECEIVED CHECKLIST

(TO BE COMPLETED FOR EACH INCOMING WASTESTREAM) Date of Reception: 05/27/92

INFORMATION FROM MANIFEST

Generator: Van Waters & Rogers
3900 D St.
Omaha NE 68107

Custcode: V016
EPA ID#: NED040906729

Manifest #: 92037
Line #: 11A
Labcode: 922226

DOT Name: WFSNOS
EPA Waste #: F005 F003 D001 D035
Drum #:

Quantity: 1 DM 508 P

Acceptance: WI91-4617

INFORMATION FROM DRUMS

Is label generator different from manifest? No If yes, give name(s)_____
DOT Shipping Name ___ Hazard Class Label ___ EPA Waste # ___ Total # of Dms. 1
Size of Containers: 1 55 gal ___85 gal ___20 gal ___5 gal ___Other( ) ___Other( )
Correct Manifest Document # on each label ___ Accum. Start Date on each label ___
Have discrepancies between manifest, labels, and drum #s been reported? ___ To whom? ___
Are any drums leaking? Yes___ No___ How many? ___ Is the leak controlled? Yes___ No___
Are there any drums excessively dented or rusted? Yes___ No___ How many? ___
All drums of wastestream are sampled, composite sample made (mixed for at least 1 min.), and a one pint sample made___, compatibility___ Date 5-28-92 If incompatible, explain in what way._____
Have unacceptable drums and incompatible reactions been reported? To whom? ___
Completed by _____ Date 5-27-92

SOLIDS DEPTH (in inches) AND SPECIFIC GRAVITY IN LIQUID DRUMS

	in.	pH	spg.		in.	pH	spg.		in.	pH	spg.		in.	pH	spg.
1.	30			26.				51.				76.			
2.				27.				52.				77.			
3.				28.				53.				78.			
4.				29.				54.				79.			
5.				30.				55.				80.			
6.				31.				56.				81.			
7.				32.				57.				82.			
8.				33.				58.				83.			
9.				34.				59.				84.			
10.				35.				60.				85.			
11.				36.				61.				86.			
12.				37.				62.				87.			
13.				38.				63.				88.			
14.				39.				64.				89.			
15.				40.				65.				90.			
16.				41.				66.				91.			
17.				42.				67.				92.			
18.				43.				68.				93.			
19.				44.				69.				94.			
20.				45.				70.				95.			
21.				46.				71.				96.			
22.				47.				72.				97.			
23.				48.				73.				98.			
24.				49.				74.				99.			
25.				50.				75.				100.			

Comments: _____

Disposal: KF___ (____%Cl) Wastewater___ (F-listed___) Incineration ✓
Landfill: Gondola___ Corrosive___ (Normality____) Battery___ F006___
Reclamation: Solvent___ (____%Yield) Oil___ Sparging___ TULSA ONLY___

Department of Health & Environment
Division of Environment

PHOTO MOUNTING SHEET

Name of Site: Hydrocarbon Recyclers, Inc. EPA ID # KSD007246846
2549 N. New York
Location: City Wichita County Sedgwick Legal

Picture No. 1
Date: 7-28-92
Time:
General Direction Faced:
Weather Conditions:
clear
Type of Camera:
Comments: Aisle C701- Crystallized on drum rim & down side

Picture No. 2
Date: 7-28-92
Time:
General Direction Faced:
Weather Conditions:
clear
Type of Camera:
Comments: Aisle C701 Crystallized on drum rim & down side

Department of Health & Environment
Division of Environment

PHOTO MOUNTING SHEET

Name of Site: Hydrocarbon Recyclers, Inc. **EPA ID #** KSD007246846

Location: 2549 N. New York **City** Wichita **County** Sedgwick **Legal**

Picture No. 3
Date: 7-28-92
Time:
General Direction Faced:
Weather Conditions: clear
Type of Camera:
Comments: Aisle C727 leaking drum

Picture No. 4
Date: 7-28-92
Time:
General Direction Faced:
Weather Conditions: clear
Type of Camera:
Comments: Bldg. B dented drum